U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 20, 2023

VIA Federal Express

American Funds Service Company
[redacted]
Attn: Subpoena Department

Re: Grand Jury Subpoena #GJ20230419-E0307

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA, and (3) A COMPLETED OBD-211 FORM.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*_____
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: American Funds Service Company
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230419-E0307

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230419-E0307	4/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

American Funds Service Company

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 5/4/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	4/20/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230419-E0307 dated April 20, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: American Funds Service Company
Attn: Subpoena Department
[redacted]

Method of Service: FedEx to above address

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts or investment accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

American Voting Rights Foundation

Re: Grand Jury Subpoena #GJ2022121297589
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: American Voting Rights Foundation

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022121297589
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**American Voting Rights Foundation**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022121297589

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297589 dated December 12, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents and communications relating to American Voting Rights Foundation from inception to September 30, 2022, including, but not limited to:

1. Documents and communications related to the formation of American Voting Rights Foundation;

2. Any agreements between American Voting Rights Foundation and any entity;

3. Documents and communications related to any monies received by American Voting Rights Foundation;

4. Documents and communications related to any monies paid or distributed by American Voting Rights Foundation;

5. Any invoices received by and/or paid by American Voting Rights Foundation;

6. Documents and communications related to one or more of Conservative Partnership Institute, Inc., Conservative Partnership Center, LLC, Save America, Save American Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC; Donald J. Trump for President, Inc.; Cyber Ninjas, Stratech, LLC; Cyfir, LLC; WAKE Technology Services, Inc., Compass Legal Services, Paracorp, Inc. d/b/a Parasec, and/or Scott Sigman, Esquire.

B. All documents and communications between or among one or more of Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to [redacted] received from Conservative Partnership Institute, Inc., including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Facsimile

Bank of America
[redacted]
Fax: [redacted]

Re: Grand Jury Subpoena #GJ2022101195568
USAO #2022R00150

Dear Bank of America:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195568
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195568	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

Bank of America, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento		10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195568 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America
[redacted]
Fax: [redacted]

Method of Service: Fax

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Name (First Middle Last): John David McEntee
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

2. Entity Name: The McEntee Group, LLC
   Address: [redacted]

3. Account Numbers: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Conservative Partnership Center, LLC

Re: Grand Jury Subpoena #GJ2022121297595
USAO #2022R00150

Dear Conservative Partnership Center, LLC:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Conservative Partnership Center, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 12, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121297595
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/12/2023	**$75.00**	**Conservative Partnership Center, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022121297595

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297595 dated December 12, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Conservative Partnership Center, LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. American Voting Rights Foundation;
7. Cyber Ninjas;
8. Stratech, LLC;
9. Cyfir, LLC;
10. Scott Sigman, Esquire;
11. Michael Roman;
12. Steven Miller;
13. Cleta Mitchell;
14. Christina Bobb;
15. Thomas Datwyler; and/or
16. Any member of the Arizona State Senate and/or an any affiliate thereof.

B. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Conservative Partnership Center, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, done by, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC,

Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, American Voting Rights Foundation and/or Cyber Ninjas or any employee, agent, or independent contractor of one of those entities.

C. Documents sufficient to show how much money Conservative Partnership Center, LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

D. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire, including, but not limited to:

1. Documents and communications related to the use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas.

4. Documents and communications related to any charitable denotations, grants, or gifts received by, or made on behalf of, the Conservative Partnership Center, LLC, on the one hand, to or from any one or more of, on the other hand, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, and/or Cyber Ninjas.

E. Documents sufficient to show the process by which Conservative Partnership Center, LLC determines who to distribute grants to, including any application and approval process.

F. To the extent any attorney or law firm is being paid directly or indirectly to represent Conservative Partnership Center, LLC by anyone other than Conservative Partnership Center, LLC, copies of the retention agreement.

G. Documents sufficient to show any legal fees that have been paid by Conservative Partnership Center, LLC, directly or indirectly, for legal services to be provided for any individual or entity other than Conservative Partnership Center, LLC, including copies of any related agreements and any invoices or bills.

H. All documents related to Conservative Partnership Center, LLC invoice #[redacted].

I. All documents and communications between or among one or more of Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Thomas Datwyler, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to [redacted] received from Save America, including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Conservative Partnership Institute, Inc.

Re: Grand Jury Subpoena #GJ2022121297596
USAO #2022R00150

Dear Conservative Partnership Institute, Inc.:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Conservative Partnership Institute, Inc.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121297596
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] C1 LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR O OCDETF O HCF O AF O ACE O	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Conservative Partnership Institute, Inc.**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	O CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	O CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	O OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	O SPECIAL (Hourly – Approval Required)	O COPY	O FULL PAGE
O INTERMEDIATE	O EXPEDITE (Approval Required)	O ORIGINAL	O CONDENSED
O DAILY (Approval Required)	O EXPRESS (Approval Required) (3 Days)	O TAPE	O ELECTRONIC

19. REQUESTED ITEM

GJ2022121297596

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297596 dated December 12, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

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F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Conservative Partnership Institute, Inc. and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. American Voting Rights Foundation;
7. Cyber Ninjas;
8. Stratech, LLC;
9. Cyfir, LLC;
10. Scott Sigman, Esquire;
11. Michael Roman;
12. Steven Miller;
13. Cleta Mitchell;
14. Christina Bobb;
15. Thomas Datwyler; and/or
16. Any member of the Arizona State Senate and/or an any affiliate thereof.

B. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Conservative Partnership Institute, Inc. between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, done by, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC,

Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, American Voting Rights Foundation and/or Cyber Ninjas or any employee, agent, or independent contractor of one of those entities.

C. Documents sufficient to show how much money Conservative Partnership Institute, Inc. received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

D. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire, including, but not limited to:

1. Documents and communications related to the use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas.

4. Documents and communications related to any charitable denotations, grants, or gifts received by, or made on behalf of, the Conservative Partnership Institute, Inc., on the one hand, to or from any one or more of, on the other hand, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, and/or Cyber Ninjas.

E. Documents sufficient to show the process by which Conservative Partnership Institute, Inc. determines who to distribute grants to, including any application and approval process.

F. To the extent any attorney or law firm is being paid directly or indirectly to represent Conservative Partnership Institute, Inc. by anyone other than Conservative Partnership Institute, Inc., copies of the retention agreement.

G. Documents sufficient to show any legal fees that have been paid by Conservative Partnership Institute, Inc., directly or indirectly, for legal services to be provided for any individual or entity other than Conservative Partnership Institute, Inc., including copies of any related agreements and any invoices or bills.

H. All documents related to Conservative Partnership Institute, Inc. invoice #[redacted].

I. All documents and communications between or among one or more of Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Thomas Datwyler, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to [redacted] received from Save America, including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses:[redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Thomas Datwyler

Re: Grand Jury Subpoena #GJ2022121297598
USAO #2022R00150

Dear Thomas Datwyler:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Thomas Datwyler

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022121297598
USAO #2022R00150
Preparer: [redacted]

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297598 dated December 12, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of
certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022121297598

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents and communications relating to American Voting Rights Foundation from inception to September 30, 2022, including, but not limited to:

1. Documents and communications related to the formation of American Voting Rights Foundation;

2. Any agreements between American Voting Rights Foundation and any entity;

3. Documents and communications related to any monies received by American Voting Rights Foundation;

4. Documents and communications related to any monies paid or distributed by American Voting Rights Foundation;

5. Any invoices received by and/or paid by American Voting Rights Foundation;

6. Documents and communications related to one or more of Conservative Partnership Institute, Inc., Conservative Partnership Center, LLC, Save America, Save American Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC; Donald J. Trump for President, Inc.; Cyber Ninjas, Stratech, LLC; Cyfir, LLC; WAKE Technology Services, Inc., Compass Legal Services, Paracorp, Inc. d/b/a Parasec, and/or Scott Sigman, Esquire.

B. All documents and communications between or among one or more of you, Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to [redacted] received from Conservative Partnership Institute, Inc., including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

Direct Persuasion, LLC

Re: Grand Jury Subpoena #GJ2022122297860
USAO #2022R00150

Dear Direct Persuasion, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Direct Persuasion, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122297860
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**Direct Persuasion, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122297860

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122297860 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books;

records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Direct Persuasion, LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or

5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Full Stack Text LLC;
2. Greenwood Consulting LLC;
3. Opn Sesame LLC;
4. OS Ventures I LLC;
5. OS Ventures II LLC;
6. Optimized Mobile Data LLC;
7. Realtime Media LLC; and/or
8. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:

1. Justlikit Limited ("Justlikit");

B. Documents sufficient to show all employees, including agents and independent contractors, of Direct Persuasion, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Direct Persuasion, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Direct Persuasion, LLC between October 1, 2020, and September 30, 2022.

E. For the period from October 1, 2020, to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on

behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Direct Persuasion, LLC received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Direct Persuasion, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Direct Persuasion, LLC for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among Direct Persuasion, LLC regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or AMMC which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, **and/or** distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent Direct Persuasion, LLC by anyone other than Direct Persuasion, LLC, copies of the retention agreement.

O. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

Full Stack Text, LLC

Re: Grand Jury Subpoena #GJ2022122197841
USAO #2022R00150

Dear Full Stack Text, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Full Stack Text, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122197841
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1	
LP	

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**Full Stack Text, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122197841

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122197841 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not

limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on,

evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Full Stack Text , LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund[;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):
    1. Save America;
    2. Save America Joint Fundraising Committee;
    3. Trump Make America Great Again Committee;
    4. Make America Great Again PAC; and/or
    5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
    1. Belmont Strategies LLC;
    2. Maja Ventures LLC; and/or
    3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
    1. Direct Persuasion, LLC
    2. Greenwood Consulting LLC;
    3. Opn Sesame LLC;
    4. OS Ventures I LLC;
    5. OS Ventures II LLC;
    6. Optimized Mobile Data LLC;
    7. Realtime Media LLC; and/or
    8. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:
    1. Justlikit Limited ("Justlikit");

B. Documents sufficient to show all employees, including agents and independent contractors, of Full Stack Text, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Full Stack Text, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the

Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Full Stack Text, LLC between October 1, 2020, and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Full Stack Text, LLC received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Full Stack Text, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the

Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Full Stack Text, LLC for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and/or distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent Full Stack Text, LLC by anyone other than Full Stack Text, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted] v

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

September 19, 2022

VIA Hand Delivery

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ2022091994982
USAO #2022R00150

Dear Chain Bridge Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
Detailed to the District of Columbia
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, September 30, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: September 19, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022091994982
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022091994982	9/19/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Chain Bridge Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W. Room [redacted]
Washington, DC 20530

6 Return Date:
9/30/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento		9/19/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C – Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (*See Attached*)	
		17 Net to Financial Institution	

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022091994982 dated September 19, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profi

ATTACHMENT

Issued to: Chain Bridge Bank [redacted]

Method of Service: In Person

Time period for requested documents: November 1, 2020 through the Present

Please provide **ANY AND ALL records** pertaining to the following individuals and/or entities:

- ***Save America PAC, Save America Leadership PAC, and/or Save America JFC, and Trump Make America Great Again JFC (c/o Red Curve Solutions, [redacted])***
- ***Known Account [redacted]***
- ***Account Ending [redacted] in the name of Save America, 11/10/2020 through 05/09/2021.***

This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

These records should include, but are not limited to, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

See next page for definitions and instructions

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Walter B. Giardina, Special Agent Daniel A. Mehochko, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 12, 2022

VIA Hand Delivery

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ2022101295639
USAO #2022R00150

Dear Chain Bridge Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101295639
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101295639	10/12/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

Chain Bridge Bank, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento		10/12/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101295639 dated October 12, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: In Person

Time period for requested documents: November 10, 2020 through the Present

Please provide **ANY AND ALL records** pertaining to the following individuals and/or entities:

- ***American Made Media Consultants LLC***
- ***Known Account*** [redacted]
- ***Name: Sean Dollman***
  SSN: [redacted]
  DOB: [redacted]
  Address: [redacted]

This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos

    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

See next page for definitions and instructions

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Walter B. Giardina, Special Agent Daniel A. Mehochko, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Electronic Mail

Avidia Bank
[redacted]
Attn: [redacted], Vice President of Deposit Operations

Re: Grand Jury Subpoena #GJ2022101195564
USAO #2022R00150

Dear Avidia Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Avidia Bank
[redacted]
Attn: [redacted], Vice President of Deposit Operations

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195564
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195564	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Avidia Bank, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento		10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195564 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Avidia Bank
[redacted], Vice President of Deposit Operations
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Name : Belmont Strategies
   Associated Address: [redacted]
   Account Number: [redacted]

2. Name: Andrew Surabian
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Hand Delivery

National Capital Bank
[redacted]
Attn: [redacted] Chief Retail Officer

Re: Grand Jury Subpoena #GJ2022101195570
USAO #2022R00150

Dear National Capital Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: National Capital Bank
[redacted]
Attn: [redacted], Chief Retail Officer

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195570
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195570	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

National Capital Bank, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento		10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195570 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: [redacted]
Chief Retail Officer
[redacted]

Method of Service: In Person

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Entity Name: Conservative Partnership Institute
   Address: [redacted]
2. Account Number: [redacted]
3. Mark Meadows
   DOB: [redacted]
   SSN: [redacted]
   Address: [redacted]
4. Cleta Mitchell
   DOB: [redacted]
   SSN: [redacted]
   LKA: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank

account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Electronic Mail

State Bank of Cross Plains
[redacted]
Attn: [redacted], Bank Secrecy Officer

Re: Grand Jury Subpoena #GJ2022101195573
USAO #2022R00150

Dear State Bank of Cross Plains:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: State Bank of Cross Plains
[redacted]
Attn: [redacted], Bank Secrecy Officer

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195573
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195573	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

State Bank of Cross Plains, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento		10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195573 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: State Bank of Cross Plains
[redacted], Bank Secrecy Act Officer

Method of Service: Email

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Entity Name: Full Compass Systems
   Address: [redacted]

2. Account Number: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.

- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Electronic Mail

TD Bank
[redacted]

Re: Grand Jury Subpoena #GJ2022101195574
USAO #2022R00150

Dear TD Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: TD Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195574
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195574	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

TD Bank, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) 9 Telephone Number: 10 Date of request:

Maria Vento 10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195574 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: TD Bank
[redacted]

Email

Method of Service:

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Name (First Middle Last): Justin Clark
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   [redacted]

2. Name (First Middle Last): Bill Stepien
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   [redacted]

3. Name (First Middle Last): Nick Trainer
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   [redacted]

4. Entity Name: National Public Affairs, LLC
   Address: [redacted]

5. Account Number: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated / purchased cashier's checks and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Facsimile

Texas Partners Bank
[redacted]
Attn: Deposit Operations
Fax: [redacted]

Re: Grand Jury Subpoena #GJ2022101195571
USAO #2022R00150

Dear Texas Partners Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other**

legal entities. Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Texas Partners Bank
[redacted]
Attn: Deposit Operations

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195571
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195571	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Texas Partners Bank, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria Vento

9 Telephone Number:

10 Date of request: 10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195571 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Deposit Operations
Texas Partners Bank
[redacted]

Method of Service: Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Entity Name: Parscale Strategy LLC
   Address: [redacted]

2. Account: Texas Partners Bank formerly Bank of San Antonio, account number [redacted]

3. Name: Brad Parscale
   DOB: [redacted]
   SSN: [redacted]
   Address: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Electronic Mail

United Bank
[redacted]
Attn: Operations Supervisor Abbie Payne

Re: Grand Jury Subpoena #GJ2022101195572
USAO #2022R00150

Dear United Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: United Bank
[redacted]
Attn: Operations Supervisor [redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury # [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195572
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195572	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

United Bank, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento		10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195572 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: United Bank
Operations Supervisor [redacted]

Method of Service: Email

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Entity Name: Event Strategies, Inc
   Address: [redacted]
2. Account Number: [redacted]
3. Name: Tim Unes
   DOB: [redacted]
   SSN: [redacted]
   Address: [redacted]
4. Name: Justin Caporale
   DOB: [redacted]
   SSN: [redacted]
   Address: [redacted]
   Address: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for

cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 19, 2022

VIA Hand Delivery

National Capital Bank
[redacted], Chief Retail Officer

Re: Grand Jury Subpoena #GJ2022101995892
USAO #2022R00150

Dear National Capital Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: National Capital Bank
[redacted], Chief Retail Officer

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 28, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 19, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022101995892
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101995892	10/19/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

National Capital Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 10/28/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento [redacted]

9 Telephone Number: [redacted]

10 Date of request: 10/19/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101995892 dated October 19, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: National Capital Bank
[redacted], Chief Retail Officer

Method of Service: **In Person**

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Name (First Middle Last): Stephen Miller
   Social Security Number: [redacted]
   Date of Birth:
   Associated Addresses:

2. Entity Name: American Voting Rights Institute
   Address: [redacted]

3. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating,

photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations

Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 20, 2022

VIA Hand Delivery

Wells Fargo Bank, N.A.

Re: Grand Jury Subpoena #GJ2022102095921
USAO #2022R00150

Dear Wells Fargo Bank, N.A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N.A.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102095921
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102095921	10/20/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Wells Fargo Bank, N.A., ,

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento	[redacted]	10/20/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102095921 dated October 20, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Wells Fargo Bank, N.A.

Method of Service: **Hand Delivery**

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Name (First Middle Last): Sidney Powell
   Social Security Number: [redacted]
   Date of Birth:
   Associated Addresses:

2. Entity Name: Sidney Powell, P.C.
   EIN: [redacted]
   Address:

3. Entity Name: LDFFTAR, Inc.
   Address: [redacted]

4. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check

    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or

reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson

Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 20, 2022

VIA Hand Delivery

Wells Fargo Bank, N.A.

Re: Grand Jury Subpoena #GJ2022102095922
USAO #2022R00150

Dear Wells Fargo Bank, N.A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N.A.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102095922
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102095922	10/20/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Wells Fargo Bank, N.A., ,

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento [redacted]	[redacted]	10/20/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102095922 dated October 20, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Wells Fargo Bank, N.A.

Method of Service: **Hand Delivery**

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Scott Sigman, Esquire – PA IOLTA Escrow Account
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions

pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 20, 2022

VIA Electronic Mail

PNC Bank
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ2022102095919
USAO #2022R00150

Dear PNC Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: PNC Bank
[redacted]
Attn: Subpoena Processing

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102095919
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102095919	10/20/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

PNC Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)
Maria K. Vento

9 Telephone Number: [redacted]

10 Date of request:
10/20/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102095919 dated October 20, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: PNC Bank
Attn: Subpoena Processing
[redacted]

Method of Service:

Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Cyfir LLC
   Address: [redacted]
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 20, 2022

VIA Facsimile

JP Morgan Chase, N.A.
[redacted]
Attn: National Subpoena Processing Center
Fax: [redacted]

Re: Grand Jury Subpoena #GJ2022102095918
USAO #2022R00150

Dear JP Morgan Chase, N.A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations,**

partnerships of more than five partners, associations, trusts, government agencies, or other legal entities. Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase, N.A.
[redacted]
Attn: National Subpoena Processing Center

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102095918
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102095918	10/20/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

JP Morgan Chase, N.A., [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)
Maria K. Vento

9 Telephone Number: [redacted]

10 Date of request:
10/20/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102095918 dated October 20, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase NA
[redacted]

Method of Service:

Fax No. [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Stratech, LLC
   Address: [redacted]
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 20, 2022

VIA Facsimile

Bank of America, N.A.
[redacted]
Attn: Legal Order Processing
Fax: [redacted]

Re: Grand Jury Subpoena #GJ2022102095916
USAO #2022R00150

Dear Bank of America, N.A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other**

legal entities. Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America, N.A.
[redacted]
Attn: Legal Order Processing

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102095916
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102095916	10/20/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

Bank of America, N.A. [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento	[redacted]	10/20/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102095916 dated October 20, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America, N.A.
[redacted]

Method of Service: **Fax No.** [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Name (First Middle Last): Sidney Powell
   Social Security Number: [redacted]
   Date of Birth:
   Associated Addresses:

2. Entity Name: Sidney Powell, P.C.
   EIN: [redacted]
   Address:

3. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating,

photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations

Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

October 18, 2022

VIA Electronic Mail

TransUnion
[redacted]

Re: Grand Jury Subpoena #GJ2022101895829
USAO #2022R00150

Dear TransUnion:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: TransUnion
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 28, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 18, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022101895829
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
10/28/2022	**$75.00**	**TransUnion** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022101895829

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101895829 dated October 18, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

SUBPOENA ATTACHMENT

TransUnion

I. ***Records/Documents Requested***

Credit reports pertaining to:

Kenneth Chesebro
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Jeffrey Clark
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

John Eastman
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Cleta Mitchell
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Michael Roman
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Mark Meadows
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Brad Parscale
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Tim Unes
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Justin Caporale
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]
Previous Address: [redacted]

Justin Clark
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Bill Stepien
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Nick Trainer
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Boris Epshteyn
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Ken Klukowski
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Rudy Giuliani
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Sidney Powell
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Jenna Ellis
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

II. IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

October 18, 2022

VIA Electronic Mail

Experian
[redacted]

Re: Grand Jury Subpoena #GJ2022101895828
USAO #2022R00150

Dear Experian:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Experian
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, October 28, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 18, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022101895828
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
10/28/2022	**$75.00**	**Experian** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022101895828

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101895828 dated October 18, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

SUBPOENA ATTACHMENT

EXPERIAN

I. ***Records/Documents Requested***

Credit reports pertaining to:

Kenneth Chesebro
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Jeffrey Clark
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

John Eastman
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Cleta Mitchell
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Michael Roman
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Mark Meadows
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Brad Parscale
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Tim Unes
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Justin Caporale
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]
Previous Address: [redacted]

Justin Clark
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Bill Stepien
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Nick Trainer
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Boris Epshteyn
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Ken Klukowski
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Rudy Giuliani
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Sidney Powell
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Jenna Ellis
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

II. IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 20, 2022

VIA Electronic Mail

Sabal Palm Bank n/k/a Seacoast Bank
[redacted]

Re: Grand Jury Subpoena #GJ2022102095920
USAO #2022R00150

Dear Sabal Palm Bank n/k/a Seacoast Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Sabal Palm Bank n/k/a Seacoast Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102095920
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102095920	10/20/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

[redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento	[redacted]	10/20/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102095920 dated October 20, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Sabal Palm Bank n/k/a Seacoast Bank
[redacted]

Method of Service: **Email:** [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Name (First Middle Last): Douglas Logan
   Social Security Number: [redacted]
   Date of Birth:
   Associated Addresses:

2. Entity Name: Cyber Ninjas, Inc.
   Address: [redacted]

3. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank

account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic

recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535

Email addresses: [redacted]; [redacted]; [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 26, 2022

VIA Facsimile

JP Morgan Chase, N.A.
[redacted]

Re: Grand Jury Subpoena #GJ2022102195994
USAO #2022R00150

Dear JP Morgan Chase, N.A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 4, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 21, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022102195994
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022102195994	10/21/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

JP Morgan Chase, N.A., [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/4/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)
Maria K. Vento

9 Telephone Number: [redacted]

10 Date of request:
10/26/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022102195994 dated October 21, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
[redacted]

Method of Service: Fax

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Entity Name: Elections, LLC
   Address: [redacted]

2. Name (First Middle Last): Justin Clark
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

1. Name (First Middle Last): Stefan Passantino
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

2. Account Numbers: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings

or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations

Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]; [redacted]; [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

October 18, 2022

VIA Electronic Mail

Equifax Credit Information Services, Inc
[redacted]

Re: Grand Jury Subpoena #GJ2022101895827
USAO #2022R00150

Dear Equifax Credit Information Services, Inc:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Equifax Credit Information Services, Inc
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, October 28, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 18, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022101895827
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
10/28/2022	**$75.00**	**Equifax Credit Information Services, Inc** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022101895827

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101895827 dated October 18, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

SUBPOENA ATTACHMENT

EQUIFAX

I. ***Records/Documents Requested***

Credit reports pertaining to:

Kenneth Chesebro
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Jeffrey Clark
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

John Eastman
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Cleta Mitchell
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Michael Roman
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Mark Meadows
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Brad Parscale
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Tim Unes
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Justin Caporale
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]
Previous Address: [redacted]

Justin Clark
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Bill Stepien
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Nick Trainer
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Boris Epshteyn
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Ken Klukowski
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Rudy Giuliani
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Sidney Powell
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

Jenna Ellis
DOB: [redacted]
SSN: [redacted]
ADDRESS: [redacted]

II. IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 2, 2022

VIA Federal Express

City National Bank
[redacted]
Attn: Legal Processing

Re: Grand Jury Subpoena #GJ2022110296268
USAO #2022R00150

Dear City National Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: City National Bank
[redacted]
Attn: Legal Processing

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, November 18, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 2, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022110296268
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022110296268	11/2/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

City National Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/18/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) 9 Telephone Number: 10 Date of request:

Maria K. Vento/[redacted] [redacted] 11/2/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C – Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (*See Attached*)	
		17 Net to Financial Institution	

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022110296268 dated November 2, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: City National Bank
Attn: Legal Processing
[redacted]

Method of Service:

FedEx

Legal Processing
[redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-April 2021 for the following:

1. Account Number: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax

notifications

- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and

each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 2, 2022

VIA Electronic Mail

Bank of Central Florida
Attn: Branch Manager [redacted]

Re: Grand Jury Subpoena #GJ2022110296269
USAO #2022R00150

Dear Bank of Central Florida:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of Central Florida
Attn: Branch Manager [redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 18, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 2, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022110296269
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022110296269	11/2/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Bank of Central Florida, ,

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 11/18/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento/[redacted]	[redacted]	11/2/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C – Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (*See Attached*)	17 Net to Financial Institution

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022110296269 dated November 2, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: Bank of Centeral Florida

Method of Service: **Email**

Branch Manager [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-April 2021 for the following:

1. Account Number: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.

- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted] ov
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 2, 2022

VIA Electronic Mail

Center National Bank
Attn: [redacted], President

Re: Grand Jury Subpoena #GJ2022110296270
USAO #2022R00150

Dear Center National Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Center National Bank
Attn: [redacted], President

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 18, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 2, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022110296270
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022110296270	11/2/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Center National Bank, ,

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 11/18/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento/[redacted]	[redacted]	11/2/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C – Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (*See Attached*)	17 Net to Financial Institution

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022110296270 dated November 2, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: Center National Bank
[redacted], President

Method of Service: Email
[redacted], Vice President
[redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-April 2021 for the following:

1. Outgoing Wire Transfer from My Pillow Inc. on 11/30/2020 [redacted] in the name of Women for America First.
2. Outgoing Wire Transfer from My Pillow Inc. on 12/4/2020 [redacted] in the name of Women for America First.

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications

- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and

representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]

Forensic Accountant Showlatha Johnson, [redacted]
Financial Analyst Bryan Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 4, 2022

VIA Electronic Mail

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ2022110496358
USAO #2022R00150

Dear Chain Bridge Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, November 18, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 4, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022110496358
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022110496358	11/4/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Chain Bridge Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/18/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento [redacted]

9 Telephone Number: [redacted]

10 Date of request: 11/4/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C – Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (*See Attached*)	
		17 Net to Financial Institution	

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022110496358 dated November 4, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: Electronically

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Entity Name: Conservative Partnership Institute
   Address: [redacted]

2. Mark Meadows
   DOB: [redacted]
   SSN: [redacted]
   Address: [redacted]

3. Cleta Mitchell
   DOB: [redacted]
   SSN: [redacted]
   LKA: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated / purchased cashier's checks and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are

retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]

Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 8, 2022

VIA Electronic Mail

Silicon Valley Bank
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ2022110896475
USAO #2022R00150

Dear Silicon Valley Bank:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Silicon Valley Bank
[redacted]
Attn: Legal Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, November 18, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 8, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022110896475
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022110896475	11/8/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

Silicon Valley Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
11/18/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) 9 Telephone Number: 10 Date of request:

Maria K. Vento [redacted] [redacted] 11/8/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022110896475 dated November 8, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Silicon Valley Bank
Attn: Legal Department
[redacted]

Method of Service: **Email:** [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Direct Persuasion, LLC
   Address: [redacted]
   Address:
2. Entity Name: OPN Sesame, LLC
   Address: [redacted]
   Address:
3. Account Number: [redacted]
4. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)

    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 10, 2022

VIA Electronic Mail

Save America Joint Fundraising Committee

Re: Grand Jury Subpoena #GJ2022111096630
USAO #2022R00150

Dear Save America Joint Fundraising Committee:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

John D. Crabb, Jr.
J.P. Cooney
Capitol Siege Section

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Save America Joint Fundraising Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 10, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022111096630
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Save America Joint Fundraising Committee**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111096630

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111096630 dated November 10, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or

Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents related to the decision to create and/or the creation of Save America and/or the Save America Joint Fundraising Committee.

B. Documents sufficient to show the organization of and employees, agents and independent contractors, of Save America and the Save America Joint Fundraising Committee from inception to date.

C. Payroll records for any and all employees, agents, or independent contractors of Save America and/or Save America Joint Fundraising Committee.

D. All agreements, including drafts and final agreements, between or among two or more of the Republican National Committee, the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

E. Documents sufficient to show all employees, including agents and independent contractors, of Save America and/or Save America Joint Fundraising Committee, on the one hand, who worked with, one or more of, on the other hand, the Republican National Committee, the Trump Make America Great Again Committee, Make American Great Again PAC, and/or Donald J. Trump for President, Inc., with regards to fundraising between October 1, 2020, and June 30, 2021.

F. For the period October 1, 2020 through June 30, 2021, all documents and communications relating to the Trump Make America Great Committee, Make America Great Again PAC, and/or Donald J. Trump for President, Inc., including, but not limited to, documents and communications regarding joint fundraising efforts, flow of money raised, and/or spending of money raised.

G. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) election fraud; and/or (5) an "Election Defense Fund."

H. With regard to the fundraising emails sent out between November 3, 2020, and June 30, 2021, by the Trump Make America Great Again Committee, Make America Great Again PAC, Save America, and/or the Save America Joint Fundraising Committee, which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of those emails, including, but not limited to, documents sufficient to show all individuals employed by Save America Joint Fundraising Committee who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the emails to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in those emails; and/or

4. To the extent those emails reference an unnamed person who purportedly witnessed election fraud, documents sufficient to identify that individual and any communications with that individual.

I. Documents sufficient to show how much money Save America Joint Fundraising Committee received as a result of the fundraising emails identified in Topic H.

J. Documents sufficient to show any debts owed by Donald J. Trump for President, Inc., Make America Great Again PAC, and/or the Trump Make America Great Committee as of January 20, 2021 that were paid by Save America Joint Fundraising Committee.

K. All agreements, draft or final, between Save America Joint Fundraising Committee and one or more of the following entities:

1. American Made Media Consultants
2. Belmont Strategies
3. Event Strategies, Inc.
4. Full Compass Systems
5. Hudson Digital LLC
6. Magnolia Management LLC
7. The McEntee Group LLC

8. National Public Affairs, LLC and/or
9. Parscale Strategy

L. All agreements, draft or final, between Save America Joint Fundraising Committee, on the one hand, and any law firm or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity, whether directly or through another entity, including, but not limited to, all agreements with the following entities:

1. Abel Bean Law P.A.
2. Belkin Burden Wenig & Goldman, LLP
3. Bowers Law Office LLC
4. Brand Woodward Law
5. Brownstein Hyatt Farber Schreck, LLP
6. Caruso Law Office, P.C.
7. Clark Hill P.L.C.
8. Cleveland, Waters and Bass, P.A.
9. Conway, Olenjniczak & Jerry, S.C.
10. David Schoen, Attorney at Law
11. Dhillon Law Group Inc.
12. Dwight L. Thomas, P.C.
13. Elections, LLC
14. Jenna Ellis
15. Harder LLP
16. Harvey & Binnall, PLLC
17. Hawkins Parnell & Young, LLP
18. Jackson Kelly PLLC
19. Jennifer Little LLC
20. Jones Day
21. JPRowley Law PLLC
22. Kasowitz, Benson, Torres LLP
23. Kroger Gardis & Regas, LLP
24. Thomas Lane, PLLC
25. Larocca Hornik Rosen Greenberg & Blaha LLP
26. Law Offices of Michael T. Van Der Veen
27. McCarthy Wilson LLP

28. Stuart McCommas
29. Mukasey Frenchman & Sklaroff LLP
30. Peroff Saunders, P.C.
31. Smith & Liss LLC
32. Squire Patton Boggs LLP
33. Testa Heck Testa & White, PA
34. The Hilbert Law Firm, LLC
35. Themis Group LLC
36. Tilem & Associates, PC
37. Tobin, O'Connor & Ewing
38. Troupis Law Office
39. True North Law, LLC
40. Wilenchik & Bartness, PC

Please Return To:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 10, 2022

VIA Electronic Mail

Save America

Re: Grand Jury Subpoena #GJ2022111096631
USAO #2022R00150

Dear Save America:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

John D. Crabb, Jr.
J.P. Cooney
Capitol Siege Section

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Save America

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 10, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022111096631
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Save America**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111096631

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111096631 dated November 10, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or

Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents related to the decision to create and/or the creation of Save America and/or the Save America Joint Fundraising Committee.

B. Documents sufficient to show the organization of and employees, agents and independent contractors, of Save America and the Save America Joint Fundraising Committee from inception to date.

C. Payroll records for any and all employees, agents, or independent contractors of Save America and/or Save America Joint Fundraising Committee.

D. All agreements, including drafts and final agreements, between or among two or more of the Republican National Committee, the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

E. Documents sufficient to show all employees, including agents and independent contractors, of Save America and/or Save America Joint Fundraising Committee, on the one hand, who worked with, one or more of, on the other hand, the Republican National Committee, the Trump Make America Great Again Committee, Make American Great Again PAC, and/or Donald J. Trump for President, Inc., with regards to fundraising between October 1, 2020, and June 30, 2021.

F. For the period October 1, 2020 through June 30, 2021, all documents and communications relating to the Trump Make America Great Committee, Make America Great Again PAC, and/or Donald J. Trump for President, Inc., including, but not limited to, documents and communications regarding joint fundraising efforts, flow of money raised, and/or spending of money raised.

G. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) election fraud; and/or (5) an "Election Defense Fund."

H. With regard to the fundraising emails sent out between November 3, 2020, and June 30, 2021, by the Trump Make America Great Again Committee, Make America Great Again PAC, Save America, and/or the Save America Joint Fundraising Committee, which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of those emails, including, but not limited to, documents sufficient to show all individuals employed by Save America who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the emails to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in those emails; and/or

4. To the extent those emails reference an unnamed person who purportedly witnessed election fraud, documents sufficient to identify that individual and any communications with that individual.

I. Documents sufficient to show how much money Save America received as a result of the fundraising emails identified in Topic H.

J. Documents sufficient to show any debts owed by Donald J. Trump for President, Inc., Make America Great Again PAC, and/or the Trump Make America Great Committee as of January 20, 2021 that were paid by Save America.

K. All agreements, draft or final, between Save America and one or more of the following entities:

1. American Made Media Consultants
2. Belmont Strategies
3. Event Strategies, Inc.
4. Full Compass Systems
5. Hudson Digital LLC
6. Magnolia Management LLC
7. The McEntee Group LLC
8. National Public Affairs, LLC and/or

9. Parscale Strategy

L. All agreements, draft or final, between Save America, on the one hand, and any law firm or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity, whether directly or through another entity, including, but not limited to, all agreements with the following entities:

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2. Belkin Burden Wenig & Goldman, LLP
3. Bowers Law Office LLC
4. Brand Woodward Law
5. Brownstein Hyatt Farber Schreck, LLP
6. Caruso Law Office, P.C.
7. Clark Hill P.L.C.
8. Cleveland, Waters and Bass, P.A.
9. Conway, Olenjniczak & Jerry, S.C.
10. David Schoen, Attorney at Law
11. Dhillon Law Group Inc.
12. Dwight L. Thomas, P.C.
13. Elections, LLC
14. Jenna Ellis
15. Harder LLP
16. Harvey & Binnall, PLLC
17. Hawkins Parnell & Young, LLP
18. Jackson Kelly PLLC
19. Jennifer Little LLC
20. Jones Day
21. JPRowley Law PLLC
22. Kasowitz, Benson, Torres LLP
23. Kroger Gardis & Regas, LLP
24. Thomas Lane, PLLC
25. Larocca Hornik Rosen Greenberg & Blaha LLP
26. Law Offices of Michael T. Van Der Veen
27. McCarthy Wilson LLP
28. Stuart McCommas
29. Mukasey Frenchman & Sklaroff LLP

30. Peroff Saunders, P.C.
31. Smith & Liss LLC
32. Squire Patton Boggs LLP
33. Testa Heck Testa & White, PA
34. The Hilbert Law Firm, LLC
35. Themis Group LLC
36. Tilem & Associates, PC
37. Tobin, O'Connor & Ewing
38. Troupis Law Office
39. True North Law, LLC
40. Wilenchik & Bartness, PC

Please Return To:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 10, 2022

VIA Electronic Mail

Trump Make America Great Again Committee

Re: Grand Jury Subpoena #GJ2022111096633
USAO #2022R00150

Dear Trump Make America Great Again Committee:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

John D. Crabb, Jr.
J.P. Cooney
Capitol Siege Section

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Trump Make America Great Again Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 10, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022111096633
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Trump Make America Great Again Committee**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111096633

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111096633 dated November 10, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or

Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents reflecting any information or briefing shared orally or in writing with Former President Trump between November 3, 2020, and January 20, 2021 regarding whether or not any of the election fraud allegations did or did not have any support in fact or law.

B. All agreements, including drafts and final agreements, between or among two or more of the Republican National Committee, the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

C. Documents sufficient to show all employees, including agents and independent contractors, of the Trump Make America Great Again Committee who worked with Save America and/or Save America Joint Fundraising Committee with regards to fundraising between October 1, 2020, and June 30, 2021.

D. For the period October 1, 2020 through June 30, 2021, all documents and communications relating to Save America and/or Save America Joint Fundraising Committee, including, but not limited to, documents related to the formation, funding, and/or use of money received by Save America and/or Save America Joint Fundraising Committee.

E. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) election fraud; and/or (5) an "Election Defense Fund."

F. With regard to the fundraising emails sent out between November 3, 2020, and June 30, 2021, by the Trump Make America Great Again Joint Fundraising Committee, Make America Great Again PAC, Save America and/or Save America Joint

Fundraising Committee, which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of those emails, including, but not limited to, documents sufficient to show all individuals employed by the Trump Make America Great Again Committee who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the emails to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in those emails; and/or

4. To the extent those emails reference an unnamed person who purportedly witnessed election fraud, documents sufficient to identify that individual and any communications with that individual.

G. Documents sufficient to show how much money the Trump Make America Great Again Committee received as a result of the fundraising emails identified in Topic F.

H. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in, compensation for attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

I. All agreements, draft or final, between the Trump Make America Great Again Committee and one or more of the following entities:

1. American Made Media Consultants
2. Belmont Strategies
3. Event Strategies, Inc.
4. Full Compass Systems
5. Hudson Digital LLC
6. Magnolia Management LLC
7. The McEntee Group LLC
8. National Public Affairs, LLC and/or
9. Parscale Strategy

J. All agreements, draft or final, between the Trump Make America Great Again Committee, on the one hand, and any law firm or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity, whether directly or through another entity, including, but not limited to, all agreements with the following entities:

1. Abel Bean Law P.A.
2. Belkin Burden Wenig & Goldman, LLP
3. Bowers Law Office LLC
4. Brand Woodward Law
5. Brownstein Hyatt Farber Schreck, LLP
6. Caruso Law Office, P.C.
7. Clark Hill P.L.C.
8. Cleveland, Waters and Bass, P.A.
9. Conway, Olenjniczak & Jerry, S.C.
10. David Schoen, Attorney at Law
11. Dhillon Law Group Inc.
12. Dwight L. Thomas, P.C.
13. Elections, LLC
14. Jenna Ellis
15. Harder LLP
16. Harvey & Binnall, PLLC
17. Hawkins Parnell & Young, LLP
18. Jackson Kelly PLLC
19. Jennifer Little LLC
20. Jones Day
21. JPRowley Law PLLC
22. Kasowitz, Benson, Torres LLP
23. Kroger Gardis & Regas, LLP
24. Thomas Lane, PLLC
25. Larocca Hornik Rosen Greenberg & Blaha LLP
26. Law Offices of Michael T. Van Der Veen
27. McCarthy Wilson LLP
28. Stuart McCommas
29. Mukasey Frenchman & Sklaroff LLP
30. Peroff Saunders, P.C.
31. Smith & Liss LLC
32. Squire Patton Boggs LLP
33. Testa Heck Testa & White, PA

34. The Hilbert Law Firm, LLC
35. Themis Group LLC
36. Tilem & Associates, PC
37. Tobin, O'Connor & Ewing
38. Troupis Law Office
39. True North Law, LLC
40. Wilenchik & Bartness, PC

Please Return To:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 10, 2022

VIA Electronic Mail

Make America Great Again PAC

Re: Grand Jury Subpoena #GJ2022111096629
USAO #2022R00150

Dear Make America Great Again PAC:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

John D. Crabb, Jr.
J.P. Cooney
Capitol Siege Section

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Make America Great Again PAC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 10, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022111096629
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Make America Great Again PAC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111096629

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
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Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

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_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111096629 dated November 10, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

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B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

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Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

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F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents reflecting any information or briefing shared orally or in writing with Former President Trump between November 3, 2020, and January 20, 2021 regarding whether or not any of the election fraud allegations did or did not have any support in fact or law.

B. All agreements, including drafts and final agreements, between or among two or more of the Republican National Committee, the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

C. Documents sufficient to show all employees, including agents and independent contractors, of the Make America Great Again PAC who worked with Save America and/or Save America Joint Fundraising Committee with regards to fundraising between October 1, 2020, and June 30, 2021.

D. For the period October 1, 2020 through June 30, 2021, all documents and communications relating to Save America and/or Save America Joint Fundraising Committee, including, but not limited to, documents related to the formation, funding, and/or use of money received by Save America and/or Save America Joint Fundraising Committee.

E. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) election fraud; and/or (5) an "Election Defense Fund."

F. With regard to the fundraising emails sent out between November 3, 2020, and June 30, 2021, by the Trump Make America Great Again Committee, Make America Great Again PAC, Save America and/or Save America Joint Fundraising

Committee, which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of those emails, including, but not limited to, documents sufficient to show all individuals employed by the Make America Great Again PAC who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the emails to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in those emails; and/or

4. To the extent those emails reference an unnamed person who purportedly witnessed election fraud, documents sufficient to identify that individual and any communications with that individual.

G. Documents sufficient to show how much money the Make America Great Again PAC received as a result of the fundraising emails identified in Topic F.

H. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in, compensation for attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

I. All agreements, draft or final, between the Make America Great Again PAC and one or more of the following entities:

1. American Made Media Consultants
2. Belmont Strategies
3. Event Strategies, Inc.
4. Full Compass Systems
5. Hudson Digital LLC
6. Magnolia Management LLC
7. The McEntee Group LLC
8. National Public Affairs, LLC and/or
9. Parscale Strategy

J. All agreements, draft or final, between the Make America Great Again PAC, on the one hand, and any law firm or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity, whether directly or through another entity, including, but not limited to, all agreements with the following entities:

1. Abel Bean Law P.A.

2. Belkin Burden Wenig & Goldman, LLP
3. Bowers Law Office LLC
4. Brand Woodward Law
5. Brownstein Hyatt Farber Schreck, LLP
6. Caruso Law Office, P.C.
7. Clark Hill P.L.C.
8. Cleveland, Waters and Bass, P.A
9. Conway, Olenjniczak & Jerry, S.C.
10. David Schoen, Attorney at Law
11. Dhillon Law Group Inc.
12. Dwight L. Thomas, P.C.
13. Elections, LLC
14. Jenna Ellis
15. Harder LLP
16. Harvey & Binnall, PLLC
17. Hawkins Parnell & Young, LLP
18. Jackson Kelly PLLC
19. Jennifer Little LLC
20. Jones Day
21. JPRowley Law PLLC
22. Kasowitz, Benson, Torres LLP
23. Kroger Gardis & Regas, LLP
24. Thomas Lane, PLLC
25. Larocca Hornik Rosen Greenberg & Blaha LLP
26. Law Offices of Michael T. Van Der Veen
27. McCarthy Wilson LLP
28. Stuart McCommas
29. Mukasey Frenchman & Sklaroff LLP
30. Peroff Saunders, P.C.
31. Smith & Liss LLC
32. Squire Patton Boggs LLP
33. Testa Heck Testa & White, PA
34. The Hilbert Law Firm, LLC

35. Themis Group LLC
36. Tilem & Associates, PC
37. Tobin, O'Connor & Ewing
38. Troupis Law Office
39. True North Law, LLC
40. Wilenchik & Bartness, PC

Please Return To:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 10, 2022

VIA Electronic Mail

Republican National Committee

Re: Grand Jury Subpoena #GJ2022111096632
USAO #2022R00150

Dear Republican National Committee:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

John D. Crabb, Jr.
J.P. Cooney
Capitol Siege Section

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Republican National Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 10, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022111096632
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please cal** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Republican National Committee**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111096632

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111096632 dated November 10, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or

Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents reflecting any information or briefing shared orally or in writing with Former President Trump between November 3, 2020, and January 20, 2021 regarding whether or not any of the election fraud allegations did or did not have any support in fact or law.

B. All agreements, including drafts and final agreements, between or among two or more of the Republican National Committee, the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

C. Documents sufficient to show all employees, including agents and independent contractors, of the Republican National Committee who worked with Save America and/or Save America Joint Fundraising Committee with regards to fundraising between October 1, 2020, and June 30, 2021.

D. For the period October 1, 2020 through June 30, 2021, all documents and communications relating to Save America and/or Save America Joint Fundraising Committee, including, but not limited to, documents related to the formation, funding, and/or use of money received by Save America and/or Save America Joint Fundraising Committee.

E. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) election fraud; and/or (5) an "Election Defense Fund."

F. With regard to the fundraising emails sent out between November 3, 2020, and June 30, 2021, by the Trump Make America Great Again Committee, Make America Great Again PAC, Save America and/or Save America Joint Fundraising

Committee, which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of those emails, including, but not limited to, documents sufficient to show all individuals employed by the Republican National Committee who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the emails to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in those emails; and/or

4. To the extent those emails reference an unnamed person who purportedly witnessed election fraud, documents sufficient to identify that individual and any communications with that individual.

G. Documents sufficient to show how much money the Republican National Committee received as a result of the fundraising emails identified in Topic F.

H. Documents sufficient to show any debts owed by Donald J. Trump for President, Inc., the Trump Make America Great Again Joint Fundraising Committee, and/or Make America Great Again PAC as of January 20, 2021, that were paid by the Republican National Committee.

I. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in, compensation for attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

Please Return To:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

October 11, 2022

VIA Electronic Mail

JP Morgan Chase
[redacted]

Re: Grand Jury Subpoena #GJ2022101195565
USAO #2022R00150

Dear JP Morgan Chase:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria Vento*
Maria Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, October 21, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: October 11, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022101195565
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022101195565	10/11/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

JP Morgan Chase, [redacted]

5 Deliver To: Maria Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
10/21/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria Vento	[redacted]	10/11/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022101195565 dated October 11, 2022, signed by Assistant United States Attorney Maria Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
[redacted]

Method of Service: Electronic Service

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the present for the following:

1. Name (First Middle Last): Daniel Scavino Jr.
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   [redacted]
2. Entity Name: Hudson Digital LLC
   Address: [redacted]
3. Name (First Middle Last): William Russell
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   [redacted]
4. Entity Name: Magnolia Management, LLC
   Address: [redacted]
5. Account Numbers: [redacted]

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,

- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated / purchased cashier's checks and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS / LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Daniel A. Mehochko, Special Agent Walter B. Giardina, and Forensic Accountant Showlatha Johnson
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 16, 2022

VIA Facsimile

Bank of America, N. A.
[redacted]
Attn: Legal Order Processing
Fax: [redacted]

Re: Grand Jury Subpoena #GJ2022111696751
USAO #2022R00150

Dear Bank of America, N. A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other**

legal entities. Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America, N. A.
[redacted]
Attn: Legal Order Processing

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111696751
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022111696751	11/16/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

Bank of America, N. A., [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
12/2/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento/[redacted]	[redacted]	11/16/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		

Section C – Receiving Report

14 I certify that the articles and services listed were received:	15 Date Received:	16 Disallowance (*See Attached*)	
		17 Net to Financial Institution	

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111696751 dated November 16, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America, N.A.
[redacted]

Method of Service: **Fax No.** [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Citizens United Foundation
   EIN:
   Address: [redacted]

2. Entity Name: Citizens United
   Address: [redacted]
   Address:

3. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited

    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings

or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office

601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 16, 2022

VIA Web Portal

Capital One, N. A./Capital One Bank (USA), N. A.
[redacted]

Re: Grand Jury Subpoena #GJ2022111696752
USAO #2022R00150

Dear Capital One, N. A./Capital One Bank (USA), N. A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Capital One, N. A./Capital One Bank (USA), N. A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury # [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111696752
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022111696752	11/16/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Capital One, N. A./Capital One Bank (USA), N. A., [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
12/2/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Telephone Number:	10 Date of request:
Maria K. Vento/[redacted]	[redacted]	11/16/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111696752 dated November 16, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Capital One, N.A./Capital One Bank (USA), N.A.
[redacted]

Method of Service: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Conservative Partnership Institute, Inc.
   EIN: [redacted]
   Address:
   Address:
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos

    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]

Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 22, 2022

VIA Electronic Mail

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ2022111696754
USAO #2022R00150

Dear Chain Bridge Bank:

Pursuant to a criminal investigation being conducted by the Special Counsel's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER

IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Jack Smith
Special Counsel

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury # [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 9, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 22, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111696754
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022111696754	11/16/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ (Funds available / Amount / Date) B. _____ (Approving Official / Date)

Chain Bridge Bank, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 12/9/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento/[redacted]

9 Telephone Number: [redacted]

10 Date of request: 11/22/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111696754 dated November 22, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: Electronically

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Internal transfer from Trump Make America Great Again Committee "TMAGAC OPR" (Account No. [redacted]) on 11/2/2020 [redacted]
2. Internal transfer from Chain Bridge Bank account ending [redacted] on 11/20/20[redacted] to American Made Media Consultants, LLC "AMMC Revenue" (Account No. [redacted]).

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

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LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 16, 2022

VIA Facsimile

JP Morgan Chase NA
[redacted]
Attn: National Subpoena Processing Center
Fax: [redacted]

Re: Grand Jury Subpoena #GJ2022111696755
USAO #2022R00150

Dear JP Morgan Chase NA:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations,**

partnerships of more than five partners, associations, trusts, government agencies, or other legal entities. Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase NA
[redacted]
Attn: National Subpoena Processing Center

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111696755
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022111696755	11/16/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution: A. _____ B. _____
Funds available Amount Date Approving Official Date

JP Morgan Chase NA, [redacted]

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
12/2/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) 9 Telephone Number: 10 Date of request:

Maria K. Vento/[redacted] [redacted] 11/16/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111696755 dated November 16, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase NA
[redacted]

Method of Service:

Fax No. [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: America First Policy Institute
   Address: [redacted]
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street. N.W.
Washington, D.C. 20530

November 16, 2022

VIA Hand Delivery

Wells Fargo Bank, N. A.

Re: Grand Jury Subpoena #GJ2022111696756
USAO #2022R00150

Dear Wells Fargo Bank, N. A.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N. A.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury # [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111696756
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022111696756	11/16/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Wells Fargo Bank, N. A., ,

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 12/2/2022

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento/[redacted]

9 Telephone Number: [redacted]

10 Date of request: 11/16/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111696756 dated November 16, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Wells Fargo Bank, N.A.

Method of Service: **Hand Delivery**

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: America First Policy Institute
   Address: [redacted]
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.

- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and

representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]

Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 17, 2022

VIA Electronic Mail

Equifax Credit Information Services, Inc.
[redacted]

Re: Grand Jury Subpoena #GJ2022111796793
USAO #2022R00150

Dear Equifax Credit Information Services, Inc.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Equifax Credit Information Services, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 17, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111796793
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Equifax Credit Information Services, Inc.** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111796793

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111796793 dated November 17, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

SUBPOENA ATTACHMENT

EQUIFAX

I. RECORDS/DOCUMENTS REQUESTED:

Credit reports pertaining to:

Gary Coby
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Sean Dollman
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Amy Kremer
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Kylie Kremer
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]
Possible Address: [redacted]

Douglas Logan
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

William Olsen
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Kurt Olsen
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

II. IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 17, 2022

VIA Electronic Mail

Experian
[redacted]

Re: Grand Jury Subpoena #GJ2022111796792
USAO #2022R00150

Dear Experian:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Experian
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 17, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111796792
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**Experian** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111796792

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111796792 dated November 17, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

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a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

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a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

SUBPOENA ATTACHMENT

EXPERIAN

I. RECORDS/DOCUMENTS REQUESTED:

Credit reports pertaining to:

Gary Coby
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Sean Dollman
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Amy Kremer
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Kylie Kremer
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]
Possible Address: [redacted]

Douglas Logan
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

William Olsen
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Kurt Olsen
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

II. IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Matthew M. Graves
United States Attorney

District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530

November 17, 2022

VIA Electronic Mail

TransUnion
[redacted]

Re: Grand Jury Subpoena #GJ2022111796794
USAO #2022R00150

Dear TransUnion:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Matthew M. Graves
United States Attorney

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: TransUnion
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 2, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 17, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022111796794
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/2/2022	**$75.00**	**TransUnion** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022111796794

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111796794 dated November 17, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

SUBPOENA ATTACHMENT

TRANSUNION

I. RECORDS/DOCUMENTS REQUESTED:

Credit reports pertaining to:

Gary Coby
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Sean Dollman
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Amy Kremer
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Kylie Kremer
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]
Possible Address: [redacted]

Douglas Logan
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

William Olsen
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

Kurt Olsen
DOB: [redacted]
SSN: [redacted]
LKA: [redacted]

II. IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted] bi.gov
Forensic Accountant Showlatha Johnson, [redacted] ov
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 29, 2022

VIA Electronic Mail

Bill.com, LLC
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ2022112997142
USAO #2022R00150

Dear Bill.com, LLC:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bill.com, LLC
[redacted]
Attn: Legal Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 29, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke C. Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022112997142
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Bill.com, LLC** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022112997142

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022112997142 dated November 29, 2022, signed by Assistant United States Attorney Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Legal Department
Bill.com, LLC
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. **Individual:** **Bradley Parscale**
   SSN: [redacted]
2. **Entities:** **Conservative Campaign Technology, LLC**
   Campaign Nucleus, LLC
   Parscale Strategy, LLC

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed Bill.com accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

1. Any and all account opening and verification information, including agreements, applications, contracts, photocopies of driver's license information, address, telephone number, SSN, date of birth, email, ANI information, and/or any other information received from the account holder.

2. Transaction Information: Monthly Statements and Transaction history including full 16-digit credit/debit card numbers and transaction histories, historical GPS/Geographical, and IP Address information obtained from transactions. Copies of dispute documents, including any correspondence from account holder. Notes regarding services provided/adjustments made to merchant account. Information related to the following services:

a. Accounts Payable

i. All imported bills
ii. All workflows associated with the accounts
iii. All automated or manual payments to vendors
iv. All synced data including vendor services, invoices, accounts, and "syncs" between Bill.com and any synced accounting software

b. Accounts Receivable

i. All invoices
ii. The manner and means by which invoices were sent, including all destination email or US mail addresses
iii. All reoccurring invoices
iv. All customers "nudged" for payment
v. All receiving bank account information
vi. All account receivables on autopilot
vii. All synced accounts

c. Credit and Expense Management

i. All business credit accounts
ii. All spend management or expense management products or accounts

3. Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

4. Correspondence: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities including notes of calls, SMS messages and corresponding phone numbers (both origin and destination phone numbers), e-mails, and all phone numbers or e-mails used by account holder.

5. Related accounts: Any additional accounts (to including information requested in #1 through #4 above) identified by phone number, email, cookie, IP address, or other proprietary means.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in

non-proprietary electronic form and shall include text data and image data held:

i. In your record retention systems; and/or
ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested <u>not to disclose</u> the existence of this subpoena, or the fact of your compliance with it.

Information/questions can be furnished/directed to:

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535

Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 29, 2022

VIA Federal Express

Paychex
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ2022112997138
USAO #2022R00150

Dear Paychex:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Paychex
[redacted].
Attn: Legal Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 29, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke C. Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022112997138
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Paychex** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022112997138

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022112997138 dated November 29, 2022, signed by Assistant United States Attorney Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **Paychex**
Attn: Legal Department
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. **Entity:** Campaign Nucleus, LLC

2. **Individual:** Bradley Parscale
SSN: [redacted]
DOB: [redacted]

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed Paychex accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions
- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)

- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to Paychex
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between Paychex and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:

i. Using a delimited ASCII text data format; or
ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.
b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*
b. Authentication, such as hash coding, may be set by agreement.
c. Affidavits or certificates of authenticity may be included as part of the electronic production.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 29, 2022

VIA Federal Express

Intuit Inc.
c/o CSC
[redacted]

Re: Grand Jury Subpoena #GJ2022112997130
USAO #2022R00150

Dear Intuit Inc.:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Intuit Inc.
c/o CSC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 29, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke C. Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022112997130
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Intuit Inc.** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022112997130

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022112997130 dated November 29, 2022, signed by Assistant United States Attorney Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Intuit Inc.
c/o CSC
Attn: Legal Compliance Department
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. **Individual:** **Bradley Parscale**
SSN: [redacted]

2. **Entity:** **INFLUENCEABLE, LLC**

<u>These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.</u>

Any and all documents pertaining to all open or closed Intuit accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

1. Any and all account opening and verification information, including agreements, applications, contracts, photocopies of driver's license information, address, telephone number, SSN, date of birth, email, ANI information, and/or any other information received from the account holder.

2. <u>Transaction Information</u>: Monthly Merchant Statements and Transaction history, all digit credit/debit card numbers and transaction histories including historical GPS/Geographical and IP Address information obtained from transactions. Copies of dispute documents, including any correspondence from account holder. Notes regarding services provided/adjustments made to merchant account.

3. Products:

   a. QuickBooks

      i. All QuickBooks records in a native file format and include the username and password.
      ii. All income expenses
      iii. All invoice and payments
      iv. All tax deductions
      v. All comprehensive reports, ledgers, or journals including any Audit Trial reports
      vi. All receipts saved with Receipt Capture
      vii. Cash Flow analyses
      viii. Sales and sales tax estimates and products
      ix. All services rendered by contractors
      x. All bill management services
      xi. All inventory documents

   b. Mint

      i. All saved budgets
      ii. All tracked bills

   c. Professional Tax

      i. All forms, automated calculations, and error diagnostics
      ii. All documents executed with eSignature

4. Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

5. Correspondence: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities including notes of calls, SMS messages and corresponding phone numbers (both origin and destination phone numbers), e-mails, and all phone numbers or e-mails used by account holder.

6. Related accounts: Any additional accounts (to including information requested in #1 through #4 above) identified by phone number, email, cookie, IP address, or other proprietary means.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
    i. In your record retention systems; and/or
    ii. By your technology, data, or other service provider(s).
b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
    i. Using a delimited ASCII text data format; or
    ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.
b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.
b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
    i. Produced in individual graphic data files with any associated endorsements; and
    ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*
b. Authentication, such as hash coding, may be set by agreement.
c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested <u>not to disclose</u> the existence of this subpoena, or the fact of your compliance with it.

Information/questions can be furnished/directed to:

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor [redacted]
Special Agent Dan Mehochko [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 29, 2022

VIA Electronic Mail

ADP
[redacted]
Attn: Legal Compliance Department

Re: Grand Jury Subpoena #GJ2022112997128
USAO #2022R00150

Dear ADP:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: ADP
[redacted]
Attn: Legal Compliance Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: November 29, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke C. Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022112997128
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please cal** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**ADP** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022112997128

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022112997128 dated November 29, 2022, signed by Assistant United States Attorney Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Issued to: ADP
Attn: Legal Compliance Department
[redacted]

Method of Service: Email [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. **Individual** — **Bradley Parscale**
   SSN: [redacted]
2. **Entity** — **Parscale Strategy, LLC**

Including all accounts in which the individuals/entity had signatory authority and/or the right of account access.

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed ADP accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions

- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)
- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to Paychex
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between APD and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested not to disclose the existence of this subpoena, or the fact of your compliance with it.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 29, 2022

VIA Federal Express

Paychex
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ2022112997127
USAO #2022R00150

Dear Paychex:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the undersigned Assistant U.S. Attorney with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Paychex
[redacted]
Attn: Legal Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury # 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the undersigned Assistant U.S. Attorney with the requested records.

Date: November 29, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke C. Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted] Fax:
Email: [redacted]

Subpoena #GJ2022112997127
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Paychex** [redacted]	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022112997127

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022112997127 dated November 29, 2022, signed by Assistant United States Attorney Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **Paychex**
Attn: Legal Department
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 1, 2019- Present for the following:

1. Entity: **Save America (Leadership PAC)**

2. Individual: **Bradley T. Crate**
[redacted]

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed Paychex accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions
- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)
- Copies of all tax returns

- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to Paychex
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between Paychex and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
    i. In your record retention systems; and/or
    ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
    i. Using a delimited ASCII text data format; or

ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:

i. Produced in individual graphic data files with any associated endorsements; and

ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested not to disclose the existence of this subpoena, or the fact of your compliance with it.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Financial Analyst Bryan J. Snitselaar, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 30, 2022

VIA Electronic Mail

Full Compass Systems, Ltd.

Re: Grand Jury Subpoena #GJ2022113097207
USAO #2022R00150

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Full Compass Systems, Ltd.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

See attachment. In lieu of formal appearance before the grand jury, you may produce all responsive documents and records to:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]

Date: November 30, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022113097207
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Full Compass Systems, Ltd.**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022113097207

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022113097207 dated November 30, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Full Compass Systems, Ltd. and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Full Compass Systems, Ltd. between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Full Compass Systems, Ltd. between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Full Compass Systems, Ltd. between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Full Compass Systems, Ltd. received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. Federal and state tax returns filed by Full Compass Systems, Ltd. for tax years 2020 and 2021.

H. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

I. Documents sufficient to show work performed by Full Compass Systems, Ltd. for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

J. To the extent any attorney or law firm is being paid directly or indirectly to represent Full Compass Systems, Ltd. by anyone other than Full Compass Systems, Ltd., copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 1, 2022

VIA Electronic Mail

American Made Media Consultants, LLC

Re: Grand Jury Subpoena #GJ2022120197253
USAO #2022R00150

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: American Made Media Consultants, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 1, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120197253
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1

LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**American Made Media Consultants, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120197253

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120197253 dated December 1, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between American Made Media Consultants LLC, and one or more of the following entities:

a. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;

2. Save America Joint Fundraising Committee;

3. Trump Make America Great Again Committee;

4. Make America Great Again PAC; and/or

5. Donald J. Trump for President, Inc.

b. The following entities registered to, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund[;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC; and/or
12. Hexagon Partners LTD.

c. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;

4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and
3. Surabian Realty, LLC

B. Documents sufficient to show all employees, including agents and independent contractors, of American Made Media Consultants LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of American Made Media Consultants LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by American Made Media Consultants LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money American Made Media Consultants LLC received from one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts

and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by American Made Media Consultants LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, The Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by American Made Media Consultants LLC for one or more of the Trump Entities, American Made Media Holding Corporation, Inc., the Parscale Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent American Made Media Consultants LLC by anyone other than American Made Media Consultants LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office

601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 1, 2022

VIA Electronic Mail

American Made Media Holding Corporation, Inc.

Re: Grand Jury Subpoena #GJ2022120197254
USAO #2022R00150

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: American Made Media Holding Corporation, Inc.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 1, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120197254
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1

LP

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1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**American Made Media Holding Corporation, Inc.**	

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19. REQUESTED ITEM

GJ2022120197254

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE

Typed/Printed Name of Requestor	Typed/Printed Name of Approving Official

24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
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Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

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ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
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I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

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B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

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II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between American Made Media Holding Corporation, Inc., and one or more of the following entities:

a. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;

2. Save America Joint Fundraising Committee;

3. Trump Make America Great Again Committee;

4. Make America Great Again PAC; and/or

5. Donald J. Trump for President, Inc.

b. The following entities registered to, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1.Aurora Strategic Marketing LLC;

2. Parscale Strategy;

3. The American Greatness Fund[;

4. BCVM Services LLC;

5. Dyspatchit Email and Text Services LLC;

6. Conservative Campaign Technology LLC;

7. Campaign Nucleus LLC;

8. HCHK Technologies;

9. Medina Software Holdings, LLC;

10. Red State LLC;

11. Influenceable, LLC; and/or

12. Hexagon Partners LTD.

c. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;

2. Full Stack Text LLC;

3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and
3. Surabian Realty, LLC

B. Documents sufficient to show all employees, including agents and independent contractors, of American Made Media Holding Corporation, Inc. between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of American Made Media Holding Corporation, Inc. between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of the Trump Entities, American Made Media Consultants, the Parscale Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by American Made Media Holding Corporation, Inc. between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money American Made Media Holding Corporation, Inc. received from one or more of the Trump Entities, American Made Media Consultants, the Parscale Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by American Made Media Holding Corporation, Inc. for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of the Trump Entities, American Made Media Consultants, the Parscale Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of the Trump Entities, American Made Media Consultants, the Parscale Entities, The Surabian Entities, and/or the Coby Entities.
2. Documents and communications related to work to be done and/or done on behalf of, one or more of the Trump Entities, American Made Media Consultants., the Parscale Entities, the Surabian Entities, and/or the Coby Entities.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of the Trump Entities American Made Media Consultants, the Parscale Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by American Made Media Holding Corporation, Inc. for one or more of the Trump Entities, American Made Media Consultants, the Parscale Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent American Made Media Holding Corporation, Inc. by anyone other than American Made Media Holding Corporation, Inc., copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office

601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 30, 2022

VIA Electronic Mail

The McEntee Group

Re: Grand Jury Subpoena #GJ2022111796835
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: The McEntee Group

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: November 30, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022111796835
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR O OCDETF O HCF O AF O ACE O	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/9/2022	**$75.00**	**The McEntee Group**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	O CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	O CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	O OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR O INTERMEDIATE O DAILY (Approval Required)	O SPECIAL (Hourly – Approval Required) O EXPEDITE (Approval Required) O EXPRESS (Approval Required) (3 Days)	O COPY O ORIGINAL O TAPE	O FULL PAGE O CONDENSED O ELECTRONIC

19. REQUESTED ITEM

GJ2022111796835

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022111796835 dated November 30, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

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F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between the McEntee Group, LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of the McEntee Group, LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of the McEntee Group, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by the McEntee Group, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money the McEntee Group, LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or

bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by the McEntee Group, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by the McEntee Group, LLC for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent the McEntee Group, LLC by anyone other than the McEntee Group, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 30, 2022

VIA Electronic Mail

Magnolia Management LLC

Re: Grand Jury Subpoena #GJ2022113097191
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted] at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Magnolia Management LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: November 30, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022113097191
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Magnolia Management LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022113097191

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022113097191 dated November 30, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Magnolia Management LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Magnolia Management LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Magnolia Management LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Magnolia Management LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Magnolia Management LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or

bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by Magnolia Management LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by Magnolia Management LLC for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Magnolia Management LLC by anyone other than Magnolia Management LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 30, 2022

VIA Electronic Mail

National Public Affairs, LLC

Re: Grand Jury Subpoena #GJ2022113097212
USAO #2022R00150

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: National Public Affairs, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

See attachment. In lieu of formal appearance before the grand jury, you may produce all responsive documents and records to:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]

Date: November 30, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022113097212
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**National Public Affairs, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022113097212

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022113097212 dated November 30, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

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a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
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a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

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b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

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bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between National Public Affairs, LLC and one or more of the following entities:

   a. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

      1. Save America;

      2. Save America Joint Fundraising Committee;

      3. Trump Make America Great Again Committee;

      4. Make America Great Again PAC; and/or

      5. Donald J. Trump for President, Inc.

   b. The following entities registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

      1. Belmont Strategies LLC;

      2. Maja Ventures LLC; and/or

      3. Surabian Realty, LLC

B. Documents sufficient to show all employees, including agents and independent contractors, of National Public Affairs, LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of National Public Affairs, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of the Trump Entities and/or the Surabian Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by National Public Affairs, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money National Public Affairs, LLC received from one or more of the one or more of the Trump Entities and/or the Surabian Entities, between October 1, 2020 and September 30, 2022.

G. Federal and state tax returns filed by National Public Affairs, LLC for tax years 2020 and 2021.

H. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of the Trump Entities and/or the Surabian Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of the Trump Entities and/or the Surabian Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of the Trump Entities and/or the Surabian Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of the Trump Entities and/or the Surabian Entities.

I. Documents sufficient to show work performed by National Public Affairs, LLC for one or more of the Trump Entities and/or the Surabian Entities.

J. To the extent any attorney or law firm is being paid directly or indirectly to represent National Public Affairs, LLC by anyone other than National Public Affairs, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 30, 2022

VIA Electronic Mail

Hudson Digital LLC

Re: Grand Jury Subpoena #GJ2022113097204
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Hudson Digital LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: November 30, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022113097204
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted]

C1

LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Hudson Digital LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022113097204

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022113097204 dated November 30, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Hudson Digital LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Hudson Digital LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Hudson Digital LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Hudson Digital LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Hudson Digital LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash

(currency) or bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by Hudson Digital LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.
2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by Hudson Digital LLC for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Hudson Digital LLC by anyone other than Hudson Digital LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 1, 2022

VIA Electronic Mail

Event Strategies, Inc.

Re: Grand Jury Subpoena #GJ2022120197249
USAO #2022R00150

Dear Event Strategies, Inc.:

Pursuant to a criminal investigation being conducted by the United States Attorney's Office, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Event Strategies, Inc.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 1, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Maria K. Vento, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120197249
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1

LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
12/15/2022	**$75.00**	**Event Strategies, Inc.**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120197249

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120197249 dated December 1, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic

transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents and communications, including but not limited to images, videos, and audio, relating to the planning, staffing, coordination, funding of, fundraising related to, promoting, compensation for participation in, compensation for attendance at, logistical support for, transportation or lodging for, or intent of the Rally, subsequent march to the U.S. Capitol, and any activities at or near the U.S. Capitol grounds.

B. All Rally permitting paperwork created by, reviewed by, or referencing Event Strategies, Inc. or any agent, employee, and/or contractor thereof.

C. All documents and communications relating to any fundraising premised upon, or compensation received or provided, monetary or otherwise, for or related to: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) references to or claims of election fraud; and/or (5) an "Election Defense Fund."

D. All agreements, draft or final, between Event Strategies, Inc. and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. Women for America First;
7. Bluebonnet Fundraising LLC;
8. Turning Point USA, or Turning Point Action;
9. Tea Party Express;
10. Eighty Percent Coalition; and/or

11. Republican Attorneys General Association, including but not limited to, Rule of Law Defense Fund.

E. Documents sufficient to show all employees, including agents and contractors, of Event Strategies, Inc. between October 1, 2020 and September 30, 2022.

F. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Event Strategies, Inc. between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Women for America First, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association, or any employee, agent, or independent contractor of one of those entities.

G. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Event Strategies, Inc. between October 1, 2020 and September 30, 2022.

H. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

I. Documents sufficient to show how much money Event Strategies, Inc. received from one or more of Women for America First, the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, the Save America Joint Fundraising Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association, between October 1, 2020 and September 30, 2022.

J. Federal and state tax returns filed by Event Strategies, Inc. for tax years 2020 and 2021.

K. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Women for America First, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Women for America First, Save

America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Women for America First, Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Women for America First, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association.

L. Documents sufficient to show work performed by Event Strategies, Inc. for one or more of the Women for America First, Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, the Save America Joint Fundraising Committee, Bluebonnet Fundraising, Turning Point USA, Turning Point Action, Tea Party Express, Eighty Percent Coalition, and/or Republican Attorneys General Association.

M. For the period November 1, 2020, through January 21, 2021, all communications between Event Strategies, Inc. and/or its agents or employees, and the following individuals and/or their employees and agents, relating to the Rally, the Certification, or any claims of fraud in the 2020 Presidential Election: Caroline Wren, Cynthia ("Cindy") Chafian, Amy Kremer, Kylie Kremer, Ali Alexander, Katrina Pierson, Kimberly Guilfoyle, Julie Fancelli, Brian Jack, Max Miller, Bobby Peede, Taylor Budowich, Brad Parscale, Roger Stone, Alex Jones, Rudy Giuliani, Michael Flynn, and John Eastman.

N. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

O. To the extent any attorney or law firm is being paid directly or indirectly to represent Event Strategies, Inc. by anyone other than Event Strategies, Inc., copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 9, 2022

VIA Electronic Mail

Tim Murtaugh

Re: Grand Jury Subpoena #GJ2022111496686
USAO #2022R00150

Dear Tim Murtaugh:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. The subpoena seeks information related to your work on the 2020 Donald Trump presidential campaign. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Matthew Burke*
Matthew Burke
Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Tim Murtaugh

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, December 29, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 9, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Matthew Burke, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022111496686
USAO #2022R00150
Preparer: [redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022111496686

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also

includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period October 1, 2020, through January 20, 2021, all documents and communications:

1. Relating to the Certification.

2. Relating to or constituting any evidence (a) tending to show that there was fraud of any kind in or relating to the 2020 Presidential Election, or (b) used or relied upon to support any claim of fraud in relation to the 2020 Presidential Election.

3. Relating to any information challenging, rebutting, or undercutting any claim of fraud in the 2020 Presidential Election, or tending to show that there was not fraud in the 2020 Presidential Election, or claiming or tending to show that any allegation of fraud was unfounded, baseless, or incorrect in whole or in part.

4. Submitted to, received from, or involving any local, state, or federal public official relating to the 2020 Presidential Election. Records produced in response to this paragraph shall include, but shall not be limited to, documents and communications relating to: (a) election processes, challenges, recounts, audits, certifications, canvasses, or election observers; (b) any claim of fraud in relation to the 2020 Presidential Election, including any presentation made to any local, state, or federal public official regarding the 2020 Presidential Election, and (c) any effort to persuade any local, state, or federal public official to change or affect the results of the 2020 Presidential Election, or delay certification of the results of that election.

5. To, from, with, or involving any member of law enforcement relating to any allegation of fraud or lack of fraud in the 2020 Presidential Election;

6. Relating to the creation, drafting, signing, mailing, or delivery of any document purporting to be a Certificate certifying electoral votes in favor of Donald J. Trump and/or Michael R. Pence in or in relation to Arizona, Georgia, Michigan, Nevada, New Mexico, Pennsylvania, or Wisconsin, or any combination of those states.

7. Relating to any effort, plan, or attempt to have any person serve as an Elector in favor of Donald J. Trump and/or Michael R. Pence in or in relation to Arizona, Georgia, Michigan, Nevada, New Mexico, Pennsylvania, or Wisconsin, or any combination of those states.

8. Relating to any claim that the Vice President and/or the President of the Senate had the authority to reject or choose not to count presidential electors, to delay the certification of electors, to adjourn the Certification, or to direct that a State or States reconsider or re-evaluate its slate of presidential electors.

9. To, from, with, or including any of the following persons, to the extent that the communication or document relates in any way to the topics identified in paragraphs III.A.1 through III.A.8 of this subpoena:

a. Arizona: Nancy Cottle, Loraine Pellegrino, Tyler Bowyer, Jake Hoffman, Anthony Kern, James Lamon, Robert Montgomery, Samuel Moorhead, Greg Safsten, Kelli Ward, Michael Ward, Karen Fann, or Thomas Lane;

b. Georgia: Joseph Brannan, James "Ken" Carroll, Vikki Townsend Consiglio, Carolyn Hall Fisher, Burt Jones, Gloria Kay Godwin, David G. Hanna, Mark W. Hennessy, Mark Amick, John Downey, Cathleen Alston Latham, Daryl Moody, Brad Carver, David Shafer, Shawn Still, C.B. Yadav, John A. Isakson, Patrick Gartland, CJ Pearson, Susan Holmes, or Robert Sinners;

c. Michigan: Kathleen Berden, Rose Rook, Mayra Rodriguez, Hank Choate, Meshawn Maddock, Matt Maddock, Mari-Ann Henry, John Haggard, Clifford Frost, Kent Vanderwood, Stanley Grot, Marian Sheridan, Timothy King, James Renner, Michele Lundgren, Amy Facchinello, Ken Thompson, Terry Lynn Land, Gerald Wall, or Shawn Flynn;

d. New Mexico: Jewll Powdrell, Deborah W. Maestas, Lupe Garcia, Rosie Tripp, Anissa Ford-Tinnin, Harvey Yates, or Steve Pearce;

e. Nevada: Michael J. McDonald, James DeGraffenreid, Durward James Hindle III, Jesse Law, Shawn Meehan, or Eileen Rice;

f. Pennsylvania: Bill Bachenberg, Lou Barletta, Tom Carroll, Ted Christian, Chuck Coccodrilli, Bernadette Comfort, Sam DeMarco III, Marcela Diaz-Myers, Christie DiEsposti, Josephine Ferro, Charlie Gerow, Kevin Harley, Leah Hoopes, Ash Khare, Andre McCoy, Lisa Patton, Pat Poprik, Andy Reilly, Suk Smith, Calvin Tucker, Robert Asher, Robert Gleason, Thomas Marino, Lance Stange, Lawrence Tabas, Christine Torretti, or Carolyn Welsh;

g. Wisconsin: Andrew Hitt, Kelly Ruh, Carol Brunner, Edward Scott Grabins, Bill Feehan, Robert F. Spindell, Jr., Kathy Kiernen, Darryl Carlson, Pam Travis, Mary Buestrin, or Tom Schreibel;

h. any member, employee, or agent of the United States Department of Justice ("DOJ"), or any component, branch, litigating unit, or office of the DOJ.

B. For the period of January 1, 2020, through January 20, 2021, any and all information, communications, documents, or records relating to Dominion Voting Systems Corp., Smartmatic, Smartmatic USA, the ownership or control of any such company or company's parent, subsidiary, or affiliate, any executive of any such company, any voting machines, voting hardware, voting software, or the accuracy, inaccuracy, reliability, lack of reliability, manipulation, lack of manipulation, or vulnerability of any voting hardware, software, or system used or planned to be used in the 2020 Presidential Election.

C. For the period of November 3, 2020, through January 20, 2021, any statistical, quantitative, or mathematical analysis, assessment, or review of votes, vote tallies, voting patterns, votes cast, voting quantities, or polling data relating to the 2020 Presidential Election.

D. Any and all records, documents, and communications related to any audit, recount, or canvass of the results of the 2020 Presidential Election.

E. For the period of January 1, 2020, through January 20, 2021, all records, documents, and communications relating to the actual, expected, anticipated, or predicted tendency of any method of voting (*e.g.*, in-person voting, versus early voting, versus absentee voting) to favor or disfavor any candidate in the 2020 Presidential Election.

F. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in, compensation for attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

G. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, or compensation received or provided, monetary or otherwise, for or related to: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) references to or claims of election fraud; and/or (5) an "Election Defense Fund."

H. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to the Save America PAC, including, but not limited to, documents related to the formation of the Save America PAC, the funding of the Save America PAC, and/or the use of money received by the Save America PAC.

I. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

Subpoenaed materials may be produced to:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 28, 2022

Brad Parscale

Re: Grand Jury Subpoena #GJ2022112897059
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Matthew Burke*
Matthew Burke
Assistant United States Attorney
601 D Street, N.W.
Room No. [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Brad Parscale

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, December 15, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: November 28, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Matthew Burke, Assistant United States Attorney
601 D Street N.W. Room #[redacted]
Washington, DC 20530
Phone:[redacted] Fax:
Email:[redacted]

Subpoena #GJ2022112897059
USAO #2022R00150
Preparer:[redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022112897059

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also

includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period October 1, 2020, through January 20, 2021, all documents and communications:

1. Relating to the Certification.

2. Relating to or constituting any evidence (a) tending to show that there was fraud of any kind in or relating to the 2020 Presidential Election, or (b) used or relied upon to support any claim of fraud in relation to the 2020 Presidential Election.

3. Relating to any information challenging, rebutting, or undercutting any claim of fraud in the 2020 Presidential Election, or tending to show that there was not fraud in the 2020 Presidential Election, or claiming or tending to show that any allegation of fraud was unfounded, baseless, or incorrect in whole or in part.

4. Submitted to, received from, or involving any local, state, or federal public official relating to the 2020 Presidential Election. Records produced in response to this paragraph shall include, but shall not be limited to, documents and communications relating to: (a) election processes, challenges, recounts, audits, certifications, canvasses, or election observers; (b) any claim of fraud in relation to the 2020 Presidential Election, including any presentation made to any local, state, or federal public official regarding the 2020 Presidential Election, and (c) any effort to persuade any local, state, or federal public official to change or affect the results of the 2020 Presidential Election, or delay certification of the results of that election.

5. To, from, with, or involving any member of law enforcement relating to any allegation of fraud or lack of fraud in the 2020 Presidential Election;

6. Relating to the creation, drafting, signing, mailing, or delivery of any document purporting to be a Certificate certifying electoral votes in favor of Donald J. Trump and/or Michael R. Pence in or in relation to Arizona, Georgia, Michigan, Nevada, New Mexico, Pennsylvania, or Wisconsin, or any combination of those states.

7. Relating to any effort, plan, or attempt to have any person serve as an Elector in favor of Donald J. Trump and/or Michael R. Pence in or in relation to Arizona, Georgia, Michigan, Nevada, New Mexico, Pennsylvania, or Wisconsin, or any combination of those states.

8. Relating to any claim that the Vice President and/or the President of the Senate had the authority to reject or choose not to count presidential electors, to delay the certification of electors, to adjourn the Certification, or to direct that a State or States reconsider or re-evaluate its slate of presidential electors.

9. To, from, with, or including any of the following persons, to the extent that the communication or document relates in any way to the topics identified in paragraphs III.A.1 through III.A.8 of this subpoena:

a. Arizona: Nancy Cottle, Loraine Pellegrino, Tyler Bowyer, Jake Hoffman, Anthony Kern, James Lamon, Robert Montgomery, Samuel Moorhead, Greg Safsten, Kelli Ward, Michael Ward, Karen Fann, or Thomas Lane;

b. Georgia: Joseph Brannan, James "Ken" Carroll, Vikki Townsend Consiglio, Carolyn Hall Fisher, Burt Jones, Gloria Kay Godwin, David G. Hanna, Mark W. Hennessy, Mark Amick, John Downey, Cathleen Alston Latham, Daryl Moody, Brad Carver, David Shafer, Shawn Still, C.B. Yadav, John A. Isakson, Patrick Gartland, CJ Pearson, Susan Holmes, or Robert Sinners;

c. Michigan: Kathleen Berden, Rose Rook, Mayra Rodriguez, Hank Choate, Meshawn Maddock, Matt Maddock, Mari-Ann Henry, John Haggard, Clifford Frost, Kent Vanderwood, Stanley Grot, Marian Sheridan, Timothy King, James Renner, Michele Lundgren, Amy Facchinello, Ken Thompson, Terry Lynn Land, Gerald Wall, or Shawn Flynn;

d. New Mexico: Jewll Powdrell, Deborah W. Maestas, Lupe Garcia, Rosie Tripp, Anissa Ford-Tinnin, Harvey Yates, or Steve Pearce;

e. Nevada: Michael J. McDonald, James DeGraffenreid, Durward James Hindle III, Jesse Law, Shawn Meehan, or Eileen Rice;

f. Pennsylvania: Bill Bachenberg, Lou Barletta, Tom Carroll, Ted Christian, Chuck Coccodrilli, Bernadette Comfort, Sam DeMarco III, Marcela Diaz-Myers, Christie DiEsposti, Josephine Ferro, Charlie Gerow, Kevin Harley, Leah Hoopes, Ash Khare, Andre McCoy, Lisa Patton, Pat Poprik, Andy Reilly, Suk Smith, Calvin Tucker, Robert Asher, Robert Gleason, Thomas Marino, Lance Stange, Lawrence Tabas, Christine Torretti, or Carolyn Welsh;

g. Wisconsin: Andrew Hitt, Kelly Ruh, Carol Brunner, Edward Scott Grabins, Bill Feehan, Robert F. Spindell, Jr., Kathy Kiernen, Darryl Carlson, Pam Travis, Mary Buestrin, or Tom Schreibel;

h. any member, employee, or agent of the United States Department of Justice ("DOJ"), or any component, branch, litigating unit, or office of the DOJ.

B. For the period of January 1, 2020, through January 20, 2021, any and all information, communications, documents, or records relating to Dominion Voting Systems Corp., Smartmatic, Smartmatic USA, the ownership or control of any such company or company's parent, subsidiary, or affiliate, any executive of any such company, any voting machines, voting hardware, voting software, or the accuracy, inaccuracy, reliability, lack of reliability, manipulation, lack of manipulation, or vulnerability of any voting hardware, software, or system used or planned to be used in the 2020 Presidential Election.

C. For the period of November 3, 2020, through January 20, 2021, any statistical, quantitative, or mathematical analysis, assessment, or review of votes, vote tallies, voting patterns, votes cast, voting quantities, or polling data relating to the 2020 Presidential Election.

D. Any and all records, documents, and communications related to any audit, recount, or canvass of the results of the 2020 Presidential Election.

E. For the period of January 1, 2020, through January 20, 2021, all records, documents, and communications relating to the actual, expected, anticipated, or predicted tendency of any method of voting (*e.g.*, in-person voting, versus early voting, versus absentee voting) to favor or disfavor any candidate in the 2020 Presidential Election.

F. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in, compensation for attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

G. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, or compensation received or provided, monetary or otherwise, for or related to: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) references to or claims of election fraud; and/or (5) an "Election Defense Fund."

H. All documents and communications relating to Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, including, but not limited to, documents related to the formation, funding, and/or use of money received by Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

I. All agreements, including drafts and final agreements, between or among you personally or any entity with which you are associated, on the one hand, and one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, on the other hand.

J. Documents sufficient to show any work that you or an entity associated with you did for Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee from November 3, 2020 through June 30, 2022.

K. Documents sufficient to show any compensation received, monetary or otherwise, by you or an entity with which you are associated from Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

L. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you personally, copies of the retention agreement.

M. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

Subpoenaed materials may be produced to:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

The American Greatness Fund

Re: Grand Jury Subpoena #GJ2022120597291
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: The American Greatness Fund

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120597291
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**The American Greatness Fund**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120597291

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
					TOTAL		

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120597291 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or

messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message,

Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between The American Greatness Fund and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. BCVM Services LLC;
4. Dyspatchit Email and Text Services LLC;
5. Campaign Nucleus, LLC;
6. Conservative Campaign Technology LLC;
7. HCHK Technologies;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC; and/or
11. Angel Protection Systems, LLC

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;

2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of The American Greatness Fund between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of The American Greatness Fund between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by The American Greatness Fund between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money The American Greatness Fund received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by The American Greatness Fund for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by The American Greatness Fund for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent The American Greatness Fund by anyone other than The American Greatness Fund, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]

Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Angel Protection Systems, LLC

Re: Grand Jury Subpoena #GJ2022120597292
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Angel Protection Systems, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120597292
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Angel Protection Systems, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120597292

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120597292 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic

transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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2. Parscale Strategy;
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7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC; and/or
12. Hexagon Partners LTD.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

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1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or

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1. Direct Persuasion LLC;
2. Full Stack Text LLC;
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G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals,

sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Angel Protection Systems, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

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Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

HCHK Technologies

Re: Grand Jury Subpoena #GJ2022120297273
USAO #2022R00150

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Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: HCHK Technologies

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120297273
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**HCHK Technologies**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. **For Court Reporter requests ONLY**	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120297273

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120297273 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic

transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between HCHK Technologies and one or more of the following entities:

a. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC; and/or
11. Angel Protection Systems, LLC.

b. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

c. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;

2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

d. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of HCHK Technologies between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of HCHK Technologies between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by HCHK Technologies between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money HCHK Technologies received from one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts

and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by HCHK Technologies for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities,.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by HCHK Technologies for one or more of the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent HCHK Technologies by anyone other than HCHK Technologies, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Influenceable, LLC

Re: Grand Jury Subpoena #GJ2022120597289
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Influenceable, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120597289
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
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GJ2022120597289

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

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Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
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ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
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I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

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(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

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SUBPOENA ATTACHMENT

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II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or

other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Influenceable, LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC; and/or
11. Angel Protection Systems, LLC.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or

3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of Influenceable, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Influenceable, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Influenceable, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Influenceable, LLC received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals,

sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Influenceable, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Influenceable, LLC for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Influenceable, LLC by anyone other than Influenceable, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Medina Software and Holdings, LLC

Re: Grand Jury Subpoena #GJ2022120597288
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Medina Software and Holdings, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120597288
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Medina Software and Holdings, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120597288

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120597288 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

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other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

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2. Save America Joint Fundraising Committee;
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4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

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1. Belmont Strategies LLC;

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1. Direct Persuasion LLC;
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H. Federal and state tax returns filed by Medina Software and Holdings, LLC for tax years 2020 and 2021.

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Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Parscale Strategy

Re: Grand Jury Subpoena #GJ2022120597300
USAO #2022R00150

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Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Parscale Strategy

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120597300
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Parscale Strategy**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120597300

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120597300 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic

transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Parscale Strategy and one or more of the following entities:

a. American Made Media Consultants ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. The American Greatness Fund;
3. BCVM Services LLC;
4. Dyspatchit Email and Text Services LLC;
5. Campaign Nucleus, LLC;
6. Conservative Campaign Technology LLC;
7. HCHK Technologies;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC;
11. Angel Protection Systems, LLC;
12. American Made Media Consultants; and/or
13. America First Policy Institute.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;

2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of Parscale Strategy between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Parscale Strategy between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Parscale Strategy between October 1, 2020, and September 30, 2022.

E. For the period from October 1, 2020, to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Parscale Strategy received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Parscale Strategy for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Parscale Strategy for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Parscale Strategy by anyone other than Parscale Strategy, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]

Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Aurora Strategic Marketing LLC

Re: Grand Jury Subpoena #GJ2022120297270
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Aurora Strategic Marketing LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120297270
USAO #2022R00150
Preparer: [redacted]

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BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

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Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Aurora Strategic Marketing LLC**	

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GJ2022120297270

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
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(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

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(date)

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(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
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E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts;

photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Aurora Strategic Marketing LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").
b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):
    1. Aurora Strategic Marketing LLC;
    2. Parscale Strategy;
    3. The American Greatness Fund;
    4. BCVM Services LLC;
    5. Dyspatchit Email and Text Services LLC;
    6. Conservative Campaign Technology LLC;
    7. Campaign Nucleus LLC;
    8. HCHK Technologies;
    9. Medina Software Holdings, LLC;
    10. Red State LLC; and/or
    11. Influenceable, LLC.
c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):
    1. Save America;
    2. Save America Joint Fundraising Committee;
    3. Trump Make America Great Again Committee;
    4. Make America Great Again PAC; and/or
    5. Donald J. Trump for President, Inc.
d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
    1. Belmont Strategies LLC;
    2. Maja Ventures LLC; and/or
    3. Surabian Realty, LLC
e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
    1. Direct Persuasion LLC;
    2. Full Stack Text LLC;
    3. Greenwood Consulting LLC;
    4. Opn Sesame LLC;

5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of Aurora Strategic Marketing LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Aurora Strategic Marketing LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Aurora Strategic Marketing LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Aurora Strategic Marketing LLC received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Aurora Strategic Marketing LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Aurora Strategic Marketing LLC for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Aurora Strategic Marketing LLC by anyone other than Aurora Strategic Marketing LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

BCVM Services LLC

Re: Grand Jury Subpoena #GJ2022120597303
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: BCVM Services LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120597303
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1

LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**BCVM Services LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120597303

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120597303 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

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transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
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5. Campaign Nucleus, LLC;
6. Conservative Campaign Technology LLC;
7. HCHK Technologies;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC; and/or
11. Angel Protection Systems, LLC.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or

3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
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B. Documents sufficient to show all employees, including agents and independent contractors, of BCVM Services LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of BCVM Services LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

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G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals,

sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by BCVM Services LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

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2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

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K. To the extent any attorney or law firm is being paid directly or indirectly to represent BCVM Services LLC by anyone other than BCVM Services LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Campaign Nucleus, LLC

Re: Grand Jury Subpoena #GJ2022120297272
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Campaign Nucleus, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120297272
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1

LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Campaign Nucleus, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120297272

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120297272 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts;

photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Campaign Nucleus, LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC")

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. HCHK Technologies;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC; and/or
11. Angel Protection Systems, LLC.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;

3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of Campaign Nucleus, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Campaign Nucleus, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Campaign Nucleus, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Campaign Nucleus, LLC received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Campaign Nucleus, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Campaign Nucleus, LLC for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Campaign Nucleus, LLC by anyone other than Campaign Nucleus, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Conservative Campaign Technology LLC

Re: Grand Jury Subpoena #GJ2022120297275
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted] at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Conservative Campaign Technology LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120297275
USAO #2022R00150
Preparer: [redacted]

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BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

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Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
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11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Conservative Campaign Technology LLC**	

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ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

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(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

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(date)

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(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
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II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic

transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Conservative Campaign Technology LLC and one or more of the following entities:

a. American Made Media Consultants ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Campaign Nucleus, LLC;
7. HCHK Technologies;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC; and/or
11. Angel Protection Systems, LLC.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of Conservative Campaign Technology LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Conservative Campaign Technology LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Conservative Campaign Technology LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Conservative Campaign Technology LLC received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Conservative Campaign Technology LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Conservative Campaign Technology LLC for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Conservative Campaign Technology LLC by anyone other than Conservative Campaign Technology LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]

Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Dyspatchit Email and Text Services LLC

Re: Grand Jury Subpoena #GJ2022120597301
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Dyspatchit Email and Text Services LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120597301
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Dyspatchit Email and Text Services LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120597301

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120597301 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

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transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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2. Parscale Strategy;
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5. Campaign Nucleus, LLC;
6. Conservative Campaign Technology LLC;
7. HCHK Technologies;
8. Red State LLC;
9. Medina Software and Holdings, LLC;
10. Influenceable, LLC; and/or
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c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
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6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
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C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Dyspatchit Email and Text Services LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

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E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Dyspatchit Email and Text Services LLC received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable

Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Dyspatchit Email and Text Services LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

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2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.
3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Dyspatchit Email and Text Services LLC for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Dyspatchit Email and Text Services LLC by anyone other than Dyspatchit Email and Text Services LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 5, 2022

VIA Electronic Mail

Red State LLC

Re: Grand Jury Subpoena #GJ2022120297279
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need assistance arranging your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted].

Sincerely,

Jack Smith
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant United States Attorney
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Red State LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 5, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Brooke Watson, Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120297279
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Red State LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022120297279

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120297279 dated December 5, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic

transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Red State LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Influenceable, LLC; and/or
11. Angel Protection Systems, LLC.

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;

2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Direct Persuasion LLC;
2. Full Stack Text LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I LLC;
6. OS Ventures II LLC;
7. Optimized Mobile Data LLC;
8. Realtime Media LLC; and/or
9. RTMUK Limited

B. Documents sufficient to show all employees, including agents and independent contractors, of Red State LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Red State LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Red State LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Red State LLC received from one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals,

sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Red State LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Red State LLC for one or more of AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Red State LLC by anyone other than Red State LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 13, 2022

VIA Electronic Mail

Red Curve Solutions, LLC

Re: Grand Jury Subpoena #GJ2022121397618
USAO #2022R00150

Dear Red Curve Solutions, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant United States Attorney
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Red Curve Solutions, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 13, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121397618
USAO #2022R00150
Preparer: [redacted]

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BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) **If blank please call** [redacted]

C1 | LP

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Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Red Curve Solutions, LLC**	

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GJ2022121397618

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
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Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
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ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

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Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
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I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

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(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

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B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

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D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, which cover the time period between October 1, 2020 through September 30, 2022, between Red Curve Solutions, LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc;

a. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

b. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC.

c. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Full Stack Text LLC;
2. Direct Persuasion, LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures II LLC;
6. Optimized Mobile Data LLC;
7. Realtime Media LLC; and/or
8. RTMUK Limited.

B. Documents sufficient to show all employees, including agents and independent contractors, of Red Curve Solutions, LLC, including their role and/or title, between October 1, 2020 and September 30, 2022.

C. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Former President Donald J. Trump, Bradley Parscale, Gary Coby, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including but not limited to, how monies received and spent should be, could be, and/or were reported to the Federal Elections Commission.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

D. To the extent any attorney or law firm is being paid directly or indirectly to represent Red Curve LLC by anyone other than Red Curve LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 13, 2022

VIA Electronic Mail

Bradley Crate

Re: Grand Jury Subpoena #GJ2022121397612
USAO #2022R00150

Dear Bradley Crate:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bradley Crate

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 13, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022121397612
USAO #2022R00150
Preparer: [redacted]

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121397612 dated December 13, 2022, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of
certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022121397612

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, which cover the time period between October 1, 2020 through September 30, 2022, between Bradley Crate and/or Red Curve Solutions, LLC, on one hand, and one or more of the following entities, on the other hand:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc;

a. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems.

b. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC.

c. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Full Stack Text LLC;
2. Direct Persuasion, LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures II LLC;
6. Optimized Mobile Data LLC;
7. Realtime Media LLC; and/or
8. RTMUK Limited.

B. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Former President Donald J. Trump, Bradley Parscale, Gary Coby, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including but not limited to, how monies received and spent should be, could be, and/or were reported to the Federal Elections Commission.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

C. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:
Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Wells Fargo Bank, N.A.

Re: Grand Jury Subpoena #GJ2022121297607
USAO #2022R00150

Dear Wells Fargo Bank, N.A.:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF

THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N.A.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121297607
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022121297607	12/12/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Wells Fargo Bank, N.A., ,

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date: 1/5/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento/[redacted]

9 Telephone Number:

10 Date of request: 12/12/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297607 dated December 12, 2022, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: Wells Fargo Bank, N.A.

Method of Service: **Hand Delivery**

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Name (First Middle Last): Sidney Powell
   Social Security Number: [redacted]
   Date of Birth:
   Associated Addresses:

2. Entity Name: Sidney Powell, P.C.
   EIN: [redacted]
   Address:

3. Entity Name: LDFFTAR, Inc.
   Address: [redacted]

4. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited

    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating,

photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535

Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Wells Fargo Bank, N.A.

Re: Grand Jury Subpoena #GJ2022121297608
USAO #2022R00150

Dear Wells Fargo Bank, N.A.:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF

THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N.A.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121297608
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ2022121297608	12/12/2022	2022R00150

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ B. _____
Funds available Amount Date Approving Official Date

Wells Fargo Bank, N.A., ,

5 Deliver To: Maria K. Vento
601 D Street N.W.
Washington, DC 20530

6 Return Date:
1/5/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) 9 Telephone Number: 10 Date of request:

Maria K. Vento [redacted] 12/12/2022

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#** _____ **DUNS#** _____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

AUSA Signature Date

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297608 dated December 12, 2022, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: Wells Fargo Bank, N.A.

Method of Service: **Hand Delivery**

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020-Present for the following:

1. Entity Name: Scott Sigman, Esquire – PA IOLTA Escrow Account
2. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and

the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 16, 2022

VIA Electronic Mail

Google LLC
[redacted]

Re: Grand Jury Subpoena #GJ2022120897478
USAO #2022R00150

Dear Google LLC:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq., electronic communications services providers responding to a grand jury subpoena for production of certain records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may not be made for records or other information relating to telephone toll records and listings described in 18 U.S.C. § 2703(c)(2). Please note that under the Act, the Department of Justice will not reimburse expenses incurred for the production of information kept in the ordinary course of business. An exception can be made if compliance with a grand jury subpoena requires the expenditure of unusual effort or resources. In that circumstance, reimbursement of the "reasonable cost" of such services can be made if the government and subpoena recipient mutually agree on the amount, or if the court orders reimbursement.

If you believe that you are entitled to reimbursement, please send a full and complete itemized statement for all costs in an invoice that makes clear the basis for the reimbursement request.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED USA-212 FORM, AND (3) A COPY OF THE SUBPOENA.

Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. **Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.**

Enclosed please find a nondisclosure order from the court directing Google LLC not to notify any person (including the subscriber or customer) of the existence or content of this subpoena. You are directed not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure on your part could impede the investigation being conducted and thereby interfere with the enforcement of the law.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke Watson*
Brooke Watson
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE APPLICATION OF USA FOR 2705(b) NONDISCLOSURE ORDER FOR GRAND JURY SUBPOENA GJ2022120897478	**SC No. 22-SC-3201** **Filed Under Seal**

ORDER

This matter having come before the Court pursuant to an application under 18 U.S.C. § 2705(b) requesting an order directing Google LLC ("PROVIDER"), an electronic communication and/or remote computing service provider located in Mountain View, CA, not to notify any other person of the existence of subpoena number **GJ2022120897478** issued by the United States on behalf of a federal Grand Jury empaneled in the United States District Court for the District of Columbia (the "Subpoena"), the Court finds reasonable grounds to believe that such disclosure will result in flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation. *See* 18 U.S.C. § 2705(b)(3)-(5).

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 2705(b), PROVIDER and its employees shall not disclose the existence of the Subpoena to any other person (except attorneys for PROVIDER for the purpose of receiving legal advice) for a period of one year (commencing on the date of this Order), unless the period of nondisclosure is later modified by the Court.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

Date:

Digitally signed by Holly B. Fitzsimmons
Date: 2022.12.15 16:05:06 -05'00'

UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Google LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120897478
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Communications Content, Records or Other Information Under the Electronic Communications Privacy Act (ECPA). (Authorization, Purchase Order and Receiving Report)

This form shall be used when requesting communications content, records, or other information from electronic communications or remote computing service providers under the ECPA.

1 Tracking Number:	2 Date Order Prepared:	3 USAO Number:
GJ2022120897478	12/8/2022	2022R00150

Section A – Authorization and Purchase Order

4 Name and Address of Service Provider:
Google LLC
[redacted]

Funding Certification & Authorization:

A. _____ Budget Official Signature Funding Available Date

B. _____ Approving Official Signature Date

5 Deliver Records To:
Brooke C. Watson
601 D Street N.W.
Washington, DC 20530

Send Completed USA-212 Form & Invoice To:

6 Return Date:
1/5/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor:	9 Telephone Number:	10 Date of request:
Brooke C. Watson/[redacted]		**12/8/2022**

Section B - ECPA Service Provider Invoice

11A Invoice Number: / 11B Tax ID Number:		Quantity	Unit Price Cost	Unit Price Per	Amount
11C Service(s)/Records Provided:					

The costs above (or on the attached invoice) represent direct costs and have been incurred in searching for, assembling, reproducing or otherwise providing the requested information.

12 Signature of Service Provider Representative:	13 Date Signed:	Total Amount Claimed By Service Provider	
		16 Disallowance *(See Attached)*	
Section C - Receiving Report			
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Service Provider	

18 Electronic Communications Privacy Act - Public Law 99-508
(18 U.S.C. 2701-2712) Request Pursuant To: *(Only One Section at Left Should Be Checked)*

SECTION		OBJECT CLASS
☐	2702 Voluntary Disclosure	2570
☒	2703 Compelled Disclosure	2570
☐	Search Warrant	2570
☒	Grand Jury Subpoena	2570
☐	Court Order	2570
☐	Administrative or Judicial Subpoena	2570
☐	2704 Request for Information Following Preservation	2570

19 Signature of Approving Official: Date:

20 Funding Source

Accounting Code:

Program

21 Other Accounting/Fund Information:
Program Code: Project Code:
YREGDOC:
Call Number (if applicable):
OBL Month (YRMO):
Tax ID Number:

22 Remarks:

The costs above (or on the attached invoice) appear to be reasonably necessary and to have been directly incurred in searching for, assembling, reproducing or otherwise providing requested information

Signature of United States Attorney's Office Representative Date

FORM USA-212
EEB. 2014

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120897478 dated December 16, 2022, signed by Assistant Special Counsel Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Please provide the records and information described below, which are associated with the following accounts:

The Google LLC, account(s) associated with the following domains and email accounts:
[redacted]**.donaldtrump.**[redacted];
[redacted]**@victory.trump.**[redacted]**;**
[redacted]**@theamericanvoter.**[redacted]**;**
[redacted]**@mail.secureconservative.**[redacted]**;** and
[redacted]**@ourpresident45.**[redacted]

1. Names (including subscriber names, usernames, and screen names);
2. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
3. Local and long distance telephone connection records (including records of emails sent and received) from November 1, 2019 to present, if applicable;
4. Records of session times and durations from November 1, 2019 to present;
5. Length of service (including start date) and types of service utilized;
6. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);
7. Other subscriber numbers or identities, including any temporarily assigned network addresses (including the registration and session Internet Protocol ("IP") addresses with associated port numbers); and
8. Means and source of payment for such service (including any credit card or bank account number).

Please provide this information, if available, as data files on CD-ROM or other electronic media, or by making the information available for the government to download.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

U.S. Department of Justice

Jack Smith
Special Counsel

December 16, 2022

VIA Electronic Mail

SalesForce, Inc.
[redacted]
Attn: [redacted]

Re: Grand Jury Subpoena #GJ2022120897479
USAO #2022R00150

Dear SalesForce, Inc.:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq., electronic communications services providers responding to a grand jury subpoena for production of certain records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may not be made for records or other information relating to telephone toll records and listings described in 18 U.S.C. § 2703(c)(2). Please note that under the Act, the Department of Justice will not reimburse expenses incurred for the production of information kept in the ordinary course of business. An exception can be made if compliance with a grand jury subpoena requires the expenditure of unusual effort or resources. In that circumstance, reimbursement of the "reasonable cost" of such services can be made if the government and subpoena recipient mutually agree on the amount, or if the court orders reimbursement.

If you believe that you are entitled to reimbursement, please send a full and complete itemized statement for all costs in an invoice that makes clear the basis for the reimbursement request.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED USA-212 FORM, AND (3) A COPY OF THE SUBPOENA.

Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. **Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.**

Enclosed please find a nondisclosure order from the court directing SalesForce, Inc. not to notify any person (including the subscriber or customer) of the existence or content of this subpoena. You are directed not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure on your part could impede the investigation being conducted and thereby interfere with the enforcement of the law.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke Watson*
Brooke Watson
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE APPLICATION OF USA FOR 2705(b) NONDISCLOSURE ORDER FOR GRAND JURY SUBPOENA GJ2022120897479	**SC No. 22-SC-3202** **Filed Under Seal**

ORDER

This matter having come before the Court pursuant to an application under 18 U.S.C. § 2705(b) requesting an order directing Salesforce ("PROVIDER"), an electronic communication and/or remote computing service provider located in San Francisco, CA, not to notify any other person of the existence of subpoena number **GJ2022120897479** issued by the United States on behalf of a federal Grand Jury empaneled in the United States District Court for the District of Columbia (the "Subpoena"), the Court finds reasonable grounds to believe that such disclosure will result in flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation. *See* 18 U.S.C. § 2705(b)(3)-(5).

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 2705(b), PROVIDER and its employees shall not disclose the existence of the Subpoena to any other person (except attorneys for PROVIDER for the purpose of receiving legal advice) for a period of one year (commencing on the date of this Order), unless the period of nondisclosure is later modified by the Court.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

Date:

Digitally signed by Holly B. Fitzsimmons
Date: 2022.12.15 16:07:28 -05'00'

UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: SalesForce, Inc.
[redacted]
Attn: [redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120897479
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Communications Content, Records or Other Information Under the Electronic Communications Privacy Act (ECPA). (Authorization, Purchase Order and Receiving Report)

This form shall be used when requesting communications content, records, or other information from electronic communications or remote computing service providers under the ECPA.

1 Tracking Number:	2 Date Order Prepared:	3 USAO Number:
GJ2022120897479	12/8/2022	2022R00150

Section A – Authorization and Purchase Order

4 Name and Address of Service Provider:
SalesForce, Inc.
[redacted]
Attn:

Funding Certification & Authorization:

A. _____
Budget Official Signature Funding Available Date

B. _____
Approving Official Signature Date

5 Deliver Records To:
Brooke C. Watson
601 D Street N.W.
Washington, DC 20530

Send Completed USA-212 Form & Invoice To:

6 Return Date:
1/5/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor:	9 Telephone Number:	10 Date of request:
Brooke C. Watson/[redacted]		**12/8/2022**

Section B - ECPA Service Provider Invoice

11A Invoice Number: / 11B Tax ID Number:		Quantity	Unit Price Cost	Unit Price Per	Amount
11C Service(s)/Records Provided:					

The costs above (or on the attached invoice) represent direct costs and have been incurred in searching for, assembling, reproducing or otherwise providing the requested information.

12 Signature of Service Provider Representative:	13 Date Signed:	Total Amount Claimed By Service Provider	
		16 Disallowance *(See Attached)*	
Section C - Receiving Report			
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Service Provider	

18 Electronic Communications Privacy Act - Public Law 99-508
(18 U.S.C. 2701-2712) Request Pursuant To: *(Only One Section at Left Should Be Checked)*

SECTION		OBJECT CLASS
☐	2702 Voluntary Disclosure	2570
☒	2703 Compelled Disclosure	2570
	☐ Search Warrant	2570
	☒ Grand Jury Subpoena	2570
	☐ Court Order	2570
	☐ Administrative or Judicial Subpoena	2570
☐	2704 Request for Information Following Preservation	2570

19 Signature of Approving Official: Date:

20 Funding Source

Accounting Code:

Program

21 Other Accounting/Fund Information:
Program Code: Project Code:
YREGDOC:
Call Number (if applicable):
OBL Month (YRMO):
Tax ID Number:

22 Remarks:

The costs above (or on the attached invoice) appear to be reasonably necessary and to have been directly incurred in searching for, assembling, reproducing or otherwise providing requested information

Signature of United States Attorney's Office Representative Date

FORM USA-212
EEB. 2014

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120897479 dated December 16, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Please provide the records and information described below, which are associated with the following accounts:

The Salesforce, Inc., account(s) associated with the following domains and email accounts:
[redacted]**.donaldtrump.**[redacted];
[redacted]**@victory.trump.**[redacted]**;**
[redacted]**@theamericanvoter.**[redacted]**;**
[redacted]**@mail.secureconservative.**[redacted]**;** and
[redacted]**@ourpresident45.**[redacted]

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
3. Local and long distance telephone connection records (including records of emails sent and received) from November 1, 2019 to present, if applicable;
4. Records of session times and durations from November 1, 2019 to present;
5. Length of service (including start date) and types of service utilized;
6. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);
7. Other subscriber numbers or identities, including any temporarily assigned network addresses (including the registration and session Internet Protocol ("IP") addresses with associated port numbers); and
8. Means and source of payment for such service (including any credit card or bank account number).

Please provide this information, if available, as data files on CD-ROM or other electronic media, or by making the information available for the government to download.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

U.S. Department of Justice

Jack Smith
Special Counsel

December 16, 2022

VIA Electronic Mail

Compliance Department
GoDaddy.com, LLC
[redacted]

Re: Grand Jury Subpoena #GJ2022120897476
USAO #2022R00150

Dear GoDaddy.com, LLC:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq., electronic communications services providers responding to a grand jury subpoena for production of certain records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may not be made for records or other information relating to telephone toll records and listings described in 18 U.S.C. § 2703(c)(2). Please note that under the Act, the Department of Justice will not reimburse expenses incurred for the production of information kept in the ordinary course of business. An exception can be made if compliance with a grand jury subpoena requires the expenditure of unusual effort or resources. In that circumstance, reimbursement of the "reasonable cost" of such services can be made if the government and subpoena recipient mutually agree on the amount, or if the court orders reimbursement.

If you believe that you are entitled to reimbursement, please send a full and complete itemized statement for all costs in an invoice that makes clear the basis for the reimbursement request.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED USA-212 FORM, AND (3) A COPY OF THE SUBPOENA.

Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. **Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.**

Enclosed please find a nondisclosure order from the court directing GoDaddy.com, LLC not to notify any person (including the subscriber or customer) of the existence or content of this subpoena. You are directed not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure on your part could impede the investigation being conducted and thereby interfere with the enforcement of the law.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
Special Counsel

By: */s/ Brooke Watson*
Brooke Watson
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE APPLICATION OF USA FOR 2705(b) NONDISCLOSURE ORDER FOR GRAND JURY SUBPOENA GJ2022120897476	**SC No. 22-SC-3200** **Filed Under Seal**

ORDER

This matter having come before the Court pursuant to an application under 18 U.S.C. § 2705(b) requesting an order directing GoDaddy.com, LLC ("PROVIDER"), an electronic communication and/or remote computing service provider located in Tempe, AZ, not to notify any other person of the existence of subpoena number **GJ2022120897476** issued by the United States on behalf of a federal Grand Jury empaneled in the United States District Court for the District of Columbia (the "Subpoena"), the Court finds reasonable grounds to believe that such disclosure will result in flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation. *See* 18 U.S.C. § 2705(b)(3)-(5).

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 2705(b), PROVIDER and its employees shall not disclose the existence of the Subpoena to any other person (except attorneys for PROVIDER for the purpose of receiving legal advice) for a period of one year (commencing on the date of this Order), unless the period of nondisclosure is later modified by the Court.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

Date:

Digitally signed by Holly B. Fitzsimmons
Date: 2022.12.15 16:02:41 -05'00'

UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Compliance Department
GoDaddy.com, LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 16, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120897476
USAO #2022R00150
Preparer: [redacted]

U.S. Department of Justice
Washington, D.C. 20530

Request for Communications Content, Records or Other Information Under the Electronic Communications Privacy Act (ECPA). (Authorization, Purchase Order and Receiving Report)

This form shall be used when requesting communications content, records, or other information from electronic communications or remote computing service providers under the ECPA.

1 Tracking Number:	2 Date Order Prepared:	3 USAO Number:
GJ2022120897476	12/8/2022	2022R00150

Section A – Authorization and Purchase Order

4 Name and Address of Service Provider:
GoDaddy.com, LLC
[redacted]

Funding Certification & Authorization:

A. _____
Budget Official Signature Funding Available Date

B. _____
Approving Official Signature Date

5 Deliver Records To:
Brooke Watson
601 D Street N.W.
Washington, DC 20530

Send Completed USA-212 Form & Invoice To:

6 Return Date:
1/5/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor:	9 Telephone Number:	10 Date of request:
Brooke C. Watson/[redacted]		**12/8/2022**

Section B - ECPA Service Provider Invoice

11A Invoice Number: / 11B Tax ID Number:		Quantity	Unit Price Cost	Unit Price Per	Amount
11C Service(s)/Records Provided:					

The costs above (or on the attached invoice) represent direct costs and have been incurred in searching for, assembling, reproducing or otherwise providing the requested information.

12 Signature of Service Provider Representative:	13 Date Signed:	Total Amount Claimed By Service Provider	
		16 Disallowance *(See Attached)*	
Section C - Receiving Report			
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Service Provider	

18 Electronic Communications Privacy Act - Public Law 99-508
(18 U.S.C. 2701-2712) Request Pursuant To: *(Only One Section at Left Should Be Checked)*

SECTION		OBJECT CLASS
☐	2702 Voluntary Disclosure	2570
☒	2703 Compelled Disclosure	2570
	☐ Search Warrant	2570
	☒ Grand Jury Subpoena	2570
	☐ Court Order	2570
	☐ Administrative or Judicial Subpoena	2570
☐	2704 Request for Information Following Preservation	2570

19 Signature of Approving Official: Date:

20 Funding Source

Accounting Code:

Program

21 Other Accounting/Fund Information:
Program Code: Project Code:
YREGDOC:
Call Number (if applicable):
OBL Month (YRMO):
Tax ID Number:

22 Remarks:

The costs above (or on the attached invoice) appear to be reasonably necessary and to have been directly incurred in searching for, assembling, reproducing or otherwise providing requested information

Signature of United States Attorney's Office Representative Date

FORM USA-212
EEB. 2014

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022120897476 dated December 16, 2022, signed by Assistant United States Attorney Brooke Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Please provide the records and information described below, which are associated with the following accounts:

The GoDaddy.com, LLC account(s) associated with the following domains and email accounts:
[redacted]**.donaldtrump.**[redacted];
[redacted]**@victory.trump.**[redacted]**;**
[redacted]**@theamericanvoter.**[redacted]**;**
[redacted]**@mail.secureconservative.**[redacted]**;** and
[redacted]**@ourpresident45.**[redacted]

1. Names (including subscriber names, user names, and screen names);
2. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
3. Local and long distance telephone connection records (including records of emails sent and received) from November 1, 2019 to present, if applicable;
4. Records of session times and durations from November 1, 2019 to present;
5. Length of service (including start date) and types of service utilized;
6. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);
7. Other subscriber numbers or identities, including any temporarily assigned network addresses (including the registration and session Internet Protocol ("IP") addresses with associated port numbers); and
8. Means and source of payment for such service (including any credit card or bank account number).

Please provide this information, if available, as data files on CD-ROM or other electronic media, or by making the information available for the government to download.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Cameron Seward

Re: Grand Jury Subpoena #GJ2022120997524
USAO #2022R00150

Dear Cameron Seward:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Cameron Seward

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counse
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120997524
USAO #2022R00150
Preparer: [redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022120997524

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Conservative Partnership Institute Inc. or you and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. American Voting Rights Foundation;
7. Cyber Ninjas;
8. Stratech, LLC;
9. Cyfir, LLC;
10. Scott Sigman, Esquire;
11. Michael Roman;
12. Steven Miller;
13. Cleta Mitchell;
14. Christina Bobb;
15. Thomas Datwyler; and/or
16. Any member of the Arizona State Senate and/or an any affiliate thereof.

B. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Conservative Partnership Institute between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, done by, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again

PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, American Voting Rights Foundation and/or Cyber Ninjas or any employee, agent, or independent contractor of one of those entities.

C. Documents sufficient to show how much money Conservative Partnership Institute received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

D. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire, including, but not limited to:

1. Documents and communications related to the use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas.

4. Documents and communications related to any charitable denotations, grants, or gifts received by, or made on behalf of, the Conservative Partnership Institute, on the one hand, to or from any one or more of, on the other hand, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, and/or Cyber Ninjas.

E. Documents sufficient to show the process by which Conservative Partnership Institute determines who to distribute grants to, including any application and approval process.

F. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you, copies of the retention agreement.

G. Documents sufficient to show any legal fees that have been paid by Conservative Partnership Institute, directly or indirectly, for legal services to be provided for you, including copies of any related agreements and any invoices or bills.

H. All documents related to Conservative Partnership Institute invoice #[redacted].

I. All documents and communications between or among one or more of you, Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Thomas Datwyler, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to $1 million received from Save America, including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Edward Corrigan

Re: Grand Jury Subpoena #GJ2022120997523
USAO #2022R00150

Dear Edward Corrigan:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Edward Corrigan

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022120997525
USAO #2022R00150
Preparer: [redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022120997525

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Conservative Partnership Institute Inc. or you and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. American Voting Rights Foundation;
7. Cyber Ninjas;
8. Stratech, LLC;
9. Cyfir, LLC;
10. Scott Sigman, Esquire;
11. Michael Roman;
12. Steven Miller;
13. Cleta Mitchell;
14. Christina Bobb;
15. Thomas Datwyler; and/or
16. Any member of the Arizona State Senate and/or an any affiliate thereof.

B. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Conservative Partnership Institute between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, done by, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC,

Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, American Voting Rights Foundation and/or Cyber Ninjas or any employee, agent, or independent contractor of one of those entities.

C. Documents sufficient to show how much money Conservative Partnership Institute received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

D. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire, including, but not limited to:

1. Documents and communications related to the use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas.

4. Documents and communications related to any charitable denotations, grants, or gifts received by, or made on behalf of, the Conservative Partnership Institute, on the one hand, to or from any one or more of, on the other hand, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, and/or Cyber Ninjas.

E. Documents sufficient to show the process by which Conservative Partnership Institute determines who to distribute grants to, including any application and approval process.

F. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you, copies of the retention agreement.

G. Documents sufficient to show any legal fees that have been paid by Conservative Partnership Institute, directly or indirectly, for legal services to be provided for you, including copies of any related agreements and any invoices or bills.

H. All documents related to Conservative Partnership Institute invoice #[redacted].

I. All documents and communications between or among one or more of you, Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Cameron Seward, Thomas Datwyler, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to $1 million received from Save America, including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 19, 2022

VIA Electronic Mail

Compass Legal Services, Inc.

Re: Grand Jury Subpoena #GJ2022121597720
USAO #2022R00150

Dear Compass Legal Services, Inc.:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Compass Legal Services, Inc.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 19, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121597720
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Compass Legal Services, Inc.**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022121597720

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121597720 dated December 19, 2022, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

F. This subpoena seeks documents related to instances where Compass Legal Services, Inc. has engaged, arranged, or otherwise facilitated another attorney or law firm in potentially or actually representing an individual or entity. It does NOT seek documents related to Compass Legal Services, Inc.'s direct representation of any individual or entity.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary

entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, including any engagement agreements, between Compass Legal Services, Inc. and any individual or entity regarding the receipt of money by Compass Legal Services, Inc. for legal services to be provided by any attorney or law firm other than Compass Legal Services, Inc. in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony, including but not limited to receipt of money from one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc.

B. Documents sufficient to show how much money Compass Legal Services, Inc. has received from any other individual or entity intended to be paid to or actually paid to any attorney and/or law firm in connection with the representation by any attorney or law firm other than Compass Legal Services, Inc. of any individual or entity who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony, including but not limited to receipt of money, directly or indirectly, from one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc.

C. All non-privileged correspondence and documents between Compass Legal Services, Inc. and/or its employees, agents and/or contractors, on the one hand, and employees, agents, and/or contractors, on the other hand, of one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc. regarding payments intended to be made or actually made to any attorney and/or law firm in connection with the representation by any attorney or law firm other than Compass Legal Services, Inc. of any individual or entity (other than Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc.) who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

D. All agreements, draft or final, including any engagement agreements, between Compass Legal Services, Inc. and any individual or entity regarding the payment by Compass Legal Services, Inc. for legal services to be provided by any attorney or law firm other than Compass Legal Services, Inc. in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the

United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

E. Documents sufficient to show every person not employed by Compass Legal Services, Inc. that received a copy of any agreement, including engagement agreement, between Compass Legal Services, Inc. and any individual or entity regarding the payment by Compass Legal Services, Inc., either directly or indirectly, for legal services to be provided in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

F. Documents sufficient to show how much money Compass Legal Services, Inc. has paid to any attorney and/or law firm, directly or indirectly, in connection with the representation of any individual or entity who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

G. Documents sufficient to show every person not employed by Compass Legal Services, Inc. that received a copy of any bill received by Compass Legal Services, Inc. in connection with the representation of any individual or entity who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony, including a copy of the bill that was provided, who it was provided to, and when it was provided.

H. All non-privileged correspondence and documents between Compass Legal Services, Inc. and/or its employees, agents and/or contractors, on the one hand, and one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc., on the other hand, regarding the payment of any fees for legal services to be provided by any attorney or law firm other than Compass Legal Services, Inc. in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

I. Documents sufficient to show how much money Compass Legal Services, Inc. received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

J. Federal and state tax returns filed by Compass Legal Services, Inc. for tax years 2020 and 2021.

K. Documents sufficient to identify any individual or entity for which Compass Legal Services, Inc. or any of its employees, agents, and/or contractors, offered to arrange and/or pay for counsel who ultimately declined that representation and/or payment.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Patrick Corrigan

Re: Grand Jury Subpoena #GJ2022120997523
USAO #2022R00150

Dear Patrick Corrigan:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Patrick Corrigan

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022120997523
USAO #2022R00150
Preparer: [redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022120997523

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Conservative Partnership Institute Inc. or you and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. American Voting Rights Foundation;
7. Cyber Ninjas;
8. Stratech, LLC;
9. Cyfir, LLC;
10. Scott Sigman, Esquire;
11. Michael Roman;
12. Steven Miller;
13. Cleta Mitchell;
14. Christina Bobb;
15. Thomas Datwyler; and/or
16. Any member of the Arizona State Senate and/or an any affiliate thereof.

B. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Conservative Partnership Institute between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, done by, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, American Voting Rights Foundation and/or Cyber Ninjas or any employee, agent, or independent contractor of one of those entities.

C. Documents sufficient to show how much money Conservative Partnership Institute received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

D. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire, including, but not limited to:

1. Documents and communications related to the use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas, Stratech, LLC, Cyfir, LLC, and/or Scott Sigman, Esquire.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, Cyber Ninjas.

4. Documents and communications related to any charitable denotations, grants, or gifts received by, or made on behalf of, the Conservative Partnership Institute, on the one hand, to or from any one or more of, on the other hand, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., the Trump Make America Great Again Committee, the American Voting Rights Foundation, and/or Cyber Ninjas.

E. Documents sufficient to show the process by which Conservative Partnership Institute determines who to distribute grants to, including any application and approval process.

F. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you, copies of the retention agreement.

G. Documents sufficient to show any legal fees that have been paid by Conservative Partnership Institute, directly or indirectly, for legal services to be provided for you, including copies of any related agreements and any invoices or bills.

H. All documents related to Conservative Partnership Institute invoice #[redacted].

I. All documents and communications between or among one or more of you, Mark Meadows, Cleta Mitchell, Stephen Miller, Cameron Seward, Edward Corrigan, Thomas Datwyler, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to $1 million received from Save America, including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 19, 2022

VIA Electronic Mail

Elections LLC

Re: Grand Jury Subpoena #GJ2022121597721
USAO #2022R00150

Dear Elections LLC:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Elections LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: December 19, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022121597721
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**Elections LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022121597721

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121597721 dated December 19, 2022, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

F. This subpoena seeks documents related to instances where Elections LLC has engaged, arranged, or otherwise facilitated another attorney or law firm in potentially or actually representing an individual or entity. It does NOT seek documents related to Elections LLC direct representation of any individual or entity.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or

conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, including any engagement agreements, between Elections LLC and any individual or entity regarding the receipt of money by Elections LLC for legal services to be provided by any attorney or law firm other than Elections LLC in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice, to provide documents, information, or testimony, including but not limited to receipt of money from one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc.

B. Documents sufficient to show how much money Elections LLC has received from any other individual or entity intended to be paid to or actually paid to any attorney and/or law firm in connection with the representation by any attorney or law firm other than Elections LLC of any individual or entity, who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony, including but not limited to receipt of money, directly or indirectly, from one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc.

C. All non-privileged correspondence and documents between Elections LLC and/or its employees, agents and/or contractors, on the one hand, and employees, agents, and/or contractors, on the other hand, of one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc. regarding payments intended to be made or actually made to any attorney and/or law firm in connection with the representation by any attorney or law firm other than Elections LLC of any individual or entity (other than Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc.) who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

D. All agreements, draft or final, including any engagement agreements, between Elections LLC and any individual or entity regarding the payment by Elections LLC for legal services to be provided by any attorney or law firm other than Elections LLC, in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

E. Documents sufficient to show every person not employed by Elections LLC that received a copy of any agreement, including engagement agreement, between Elections LLC and any individual or entity regarding the payment by Elections LLC, either directly or indirectly, for legal services to be provided in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

F. Documents sufficient to show how much money Elections LLC has paid to any attorney and/or law firm, directly or indirectly, in connection with the representation of any individual or entity who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

G. Documents sufficient to show every person not employed by Elections LLC that received a copy of any bill received by Elections LLC in connection with the representation of any individual or entity who has received a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony, including a copy of the bill that was provided, who it was provided to, and when it was provided.

H. All non-privileged correspondence and documents between Elections LLC and/or its employees, agents and/or contractors, on the one hand, and one or more of Save America; Save America Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC, and/or Donald J. Trump for President, Inc., on the other hand, regarding the payment of any fees for legal services to be provided by any attorney or law firm other than Elections LLC in response to a request or a subpoena from (1) either the Select Committee to Investigate the January 6th Attack on the United States Capitol or (2) the Department of Justice to provide documents, information, or testimony.

I. Documents sufficient to show how much money Elections LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

J. Federal and state tax returns filed by Elections LLC for tax years 2020 and 2021.

K. Documents sufficient to identify any individual or entity for which Elections LLC or any of its employees, agents, and/or contractors, offered to arrange and/or pay for counsel who ultimately declined that representation and/or payment.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation

Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

Gary Coby

Re: Grand Jury Subpoena #GJ2022122297862
USAO #2022R00150

Dear Gary Coby:

Enclosed is a subpoena commanding you produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the United States Attorney's Office to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Gary Coby

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122297862
USAO #2022R00150
Preparer: [redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022122297862

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents reflecting any information or briefing shared orally or in writing with Former President Trump, Bradley Parscale, Alex Cannon, Jared Kushner, Sydney Powell, Jenna Ellis, Eric Hirschman, and/or Rudolph Giuliani between November 3, 2020, and January 20, 2021 regarding whether or not any of the election fraud allegations did or did not have any support in fact or law.

B. For the period October 1, 2020, through January 20, 2021, all documents and communications:

a. Relating to the Certification.

b. Relating to or constituting any evidence (a) tending to show that there was fraud of any kind in or relating to the 2020 Presidential Election, or (b) used or relied upon to support any claim of fraud in relation to the 2020 Presidential Election.

c. Relating to any information challenging, rebutting, or undercutting any claim of fraud in the 2020 Presidential Election, or tending to show that there was not fraud in the 2020 Presidential Election, or claiming or tending to show that any allegation of fraud was unfounded, baseless, or incorrect in whole or in part.

d. Submitted to, received from, or involving any local, state, or federal public official relating to the 2020 Presidential Election. Records produced in response to this paragraph shall include, but shall not be limited to, documents and communications relating to: (a) election processes, challenges, recounts, audits, certifications, canvasses, or election observers; (b) any claim of fraud in relation to the 2020 Presidential Election, including any presentation made to any local, state, or federal public official regarding the 2020 Presidential Election, and (c) any effort to persuade any local, state, or federal public official to change or affect the results of the 2020 Presidential Election, or delay certification of the results of that election.

e. To, from, with, or involving any member of law enforcement relating to any allegation of fraud or lack of fraud in the 2020 Presidential Election;

C. All agreements, draft or final, between Gary Coby and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

a. Save America;

b. Save America Joint Fundraising Committee;

c. Trump Make America Great Again Committee;

d. Make America Great Again PAC; and/or

e. Donald J. Trump for President, Inc.

c. Gary Coby, and/or any of the following entities owned, managed, or associated with Gary Coby (the "Coby Entities"):

a. Direct Persuasion LLC;

b. Full Stack Text LLC;

c. Greenwood Consulting LLC;

d. Opn Sesame LLC;

e. OS Ventures I LLC;

f. OS Ventures II LLC;

g. Optimized Mobile Data LLC;

h. Realtime Media LLC; and/or

i. RTMUK Limited.

d. Brady Parscale, and/or any of the following entities owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

a. Aurora Strategic Marketing LLC;

b. Parscale Strategy;

c. The American Greatness Fund;

d. BCVM Services LLC;

e. Campaign Nucleus, LLC;

f. Conservative Campaign Technology LLC;

g. HCHK Technologies;

h. Red State LLC;

i. Medina Software and Holdings, LLC;

j. Influenceable, LLC; and/or

k. Angel Protection Systems, LLC.

e. The following entities registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

a. Belmont Strategies LLC;

b. Maja Ventures LLC; and/or

c. Surabian Realty, LLC.

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:

a. Justlikit Limited ("Justlikit").

D. For the period of November 3, 2020, through January 20, 2021, any statistical, quantitative, or mathematical analysis, assessment, or review of votes, vote tallies, voting patterns, votes cast, voting quantities, or polling data relating to the 2020 Presidential Election.

E. Any and all records, documents, and communications related to any audit, recount, or canvass of the results of the 2020 Presidential Election.

F. For the period of January 1, 2020, through January 20, 2021, all records, documents, and communications relating to the actual, expected, anticipated, or predicted tendency of any method of voting (*e.g.*, in-person voting, versus early voting, versus absentee voting) to favor or disfavor any candidate in the 2020 Presidential Election.

G. All agreements, including drafts and final agreements, between or among Gary Coby regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

H. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) election fraud; and/or (5) an "Election Defense Fund."

I. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and/or distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;
6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or
7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

J. Documents sufficient to show how much money the Trump Entities, Parscale Entities, and/or American Made Media received as a result of the fundraising emails identified in Topic H.

K. Documents sufficient to show how much money Gary Coby received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, between October 1, 2020 and September 30, 2022.

L. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, including, but not limited to:

1. Documents and communications related to the use of money received by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

M. To the extent any attorney or law firm is being paid directly or indirectly to represent Gary Coby, by anyone other than Gary Coby, copies of the retention agreement.

N. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation

Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

Greenwood Consulting, LLC

Re: Grand Jury Subpoena #GJ2022122297861
USAO #2022R00150

Dear Greenwood Consulting, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Greenwood Consulting, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122297861
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	**305-961-9070**	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**Greenwood Consulting, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122297861

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122297861 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books;

records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Greenwood Consulting , LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund[;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or

5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
    1. Belmont Strategies LLC;
    2. Maja Ventures LLC; and/or
    3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
    1. Direct Persuasion, LLC;
    2. Opn Sesame LLC;
    3. OS Ventures I LLC;
    4. OS Ventures II LLC;
    5. Optimized Mobile Data LLC;
    6. Realtime Media LLC; and/or
    7. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:
    1. Justlikit Limited ("Justlikit");

B. Documents sufficient to show all employees, including agents and independent contractors, of Greenwood Consulting, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Greenwood Consulting, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Greenwood Consulting, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding

Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Greenwood Consulting, LLC received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Greenwood Consulting, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Greenwood Consulting, LLC for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among Greenwood Consulting regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent Greenwood Consulting, LLC by anyone other than Greenwood Consulting, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office

601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

Optimized Mobile Data, LLC

Re: Grand Jury Subpoena #GJ2022122297859
USAO #2022R00150

Dear Optimized Mobile Data, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Optimized Mobile Data, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122297859
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**Optimized Mobile Data, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122297859

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122297859 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books;

records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

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2. Parscale Strategy;
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8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or

5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):

1. Belmont Strategies LLC;
2. Maja Ventures LLC; and/or
3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):

1. Full Stack Text LLC;
2. Direct Persuasion, LLC;
3. Greenwood Consulting LLC;
4. Opn Sesame LLC;
5. OS Ventures I, LLC;
6. OS Ventures II, LLC;
7. Realtime Media LLC; and/or
8. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:

1. Justlikit Limited ("Justlikit").

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C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Optimized Mobile Data, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

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behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

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G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Optimized Mobile Data, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

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J. Documents sufficient to show work performed by Optimized Mobile Data, LLC for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among Optimized Mobile Data, LLC regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent Optimized Mobile Data, LLC by anyone other than Optimized Mobile Data , LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office

601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

OS Ventures I, LLC

Re: Grand Jury Subpoena #GJ2022122197846
USAO #2022R00150

Dear OS Ventures I, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: OS Ventures I, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email:[redacted]

Subpoena #GJ2022122197846
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**OS Ventures I, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122197846

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122197846 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets;

spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between OS Ventures I, LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund[;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
   1. Belmont Strategies LLC;
   2. Maja Ventures LLC; and/or
   3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
   1. Full Stack Text LLC;
   2. Direct Persuasion, LLC;
   3. Greenwood Consulting LLC;
   4. Opn Sesame LLC;
   5. OS Ventures I LLC;
   6. OS Ventures II LLC;
   7. Optimized Mobile Data LLC;
   8. Realtime Media LLC; and/or
   9. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:
   1. Justlikit Limited ("Justlikit");

B. Documents sufficient to show all employees, including agents and independent contractors, of OS Ventures I, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of OS Ventures I, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by OS Ventures I, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money OS Ventures I, LLC received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by OS Ventures I, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by OS Ventures I, LLC for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among OS Ventures I, LLC regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent OS Ventures I, LLC by anyone other than OS Ventures I , LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

OS Ventures II, LLC

Re: Grand Jury Subpoena #GJ2022122197845
USAO #2022R00150

Dear OS Ventures II, LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: OS Ventures II, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122197845
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**OS Ventures II, LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. **For Court Reporter requests ONLY**	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122197845

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122197845 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts;

logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude

other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between OS Ventures II, LLC and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund[;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;

3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
   1. Belmont Strategies LLC;
   2. Maja Ventures LLC; and/or
   3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
   1. Full Stack Text LLC;
   2. Direct Persuasion, LLC;
   3. Greenwood Consulting LLC;
   4. Opn Sesame LLC;
   5. OS Ventures II LLC;
   6. Optimized Mobile Data LLC;
   7. Realtime Media LLC; and/or
   8. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:
   1. Justlikit Limited ("Justlikit").

B. Documents sufficient to show all employees, including agents and independent contractors, of OS Ventures II, LLC between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of OS Ventures II, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by OS Ventures II, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money OS Ventures II, LLC received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by OS Ventures II, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by OS Ventures II, LLC for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the

certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among OS Ventures II, LLC regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent OS Ventures II, LLC by anyone other than OS Ventures II , LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

Realtime Media LLC

Re: Grand Jury Subpoena #GJ2022122197848
USAO #2022R00150

Dear Realtime Media LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Realtime Media LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122197848
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN (use only) If blank please call [redacted] | C1 | | LP | |

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**Realtime Media LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122197848

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

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Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122197848 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

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a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
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a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

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b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

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B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

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A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not

limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on,

evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Realtime Media LLC, and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):
    1. Save America;
    2. Save America Joint Fundraising Committee;
    3. Trump Make America Great Again Committee;
    4. Make America Great Again PAC; and/or
    5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
    1. Belmont Strategies LLC;
    2. Maja Ventures LLC; and/or
    3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
    1. Full Stack Text LLC;
    2. Direct Persuasion, LLC;
    3. Greenwood Consulting LLC;
    4. Opn Sesame LLC;
    5. OS Ventures I, LLC;
    6. OS Ventures II, LLC;
    7. Realtime Media LLC; and/or
    8. RTMUK Limited

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:
    1. Justlikit Limited ("Justlikit").

B. Documents sufficient to show all employees, including agents and independent contractors, of Realtime Media LLC, between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Realtime Media LLC, between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the

Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Realtime Media LLC, between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Realtime Media LLC, received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by Realtime Media LLC, for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the

Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by Realtime Media LLC, for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among Realtime Media, LLC regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent Realtime Media LLC, by anyone other than Realtime Media LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 27, 2022

VIA Electronic Mail

RTMUK Limited LLC

Re: Grand Jury Subpoena #GJ2022122197852
USAO #2022R00150

Dear RTMUK Limited LLC:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Brooke C. Watson*
Brooke C. Watson
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: RTMUK Limited LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 19, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 27, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Brooke C. Watson, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone:
Email: [redacted]

Subpoena #GJ2022122197852
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1

LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Brooke C. Watson	[redacted]	**CRIMINAL DIVISION**		**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/19/2023	**$75.00**	**RTMUK Limited LLC**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. **For Court Reporter requests ONLY**	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022122197852

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022122197852 dated December 27, 2022, signed by Assistant Special Counsel Brooke C. Watson, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets;

spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between RTMUK LimitedLLC, and one or more of the following entities:

a. American Made Media Consultants, LLC ("AMMC").

b. The following entities registered, owned, managed, or associated with Bradley Parscale (the "Parscale Entities"):

1. Aurora Strategic Marketing LLC;
2. Parscale Strategy;
3. The American Greatness Fund;
4. BCVM Services LLC;
5. Dyspatchit Email and Text Services LLC;
6. Conservative Campaign Technology LLC;
7. Campaign Nucleus LLC;
8. HCHK Technologies;
9. Medina Software Holdings, LLC;
10. Red State LLC;
11. Influenceable, LLC;
12. Hexagon Partners LTD; and/or
13. Angel Protection Systems

c. The following entities associated with former President Donald J. Trump (the "Trump Entities"):

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

d. The following entity registered to, owned, managed, or associated with Andrew Surabian (the "Surabian Entities"):
   1. Belmont Strategies LLC;
   2. Maja Ventures LLC; and/or
   3. Surabian Realty, LLC

e. The following entities registered to, owned, managed, or associated with Gary Coby ("Coby Entities"):
   1. Full Stack Text LLC;
   2. Direct Persuasion, LLC;
   3. Greenwood Consulting LLC;
   4. Opn Sesame LLC;
   5. OS Ventures I, LLC;
   6. OS Ventures II, LLC;
   7. Realtime Media LLC; and/or
   8. Optimized Mobile Data LLC.

f. The following entity registered to, owned, managed, or associated with Simon Wardropper:
   1. Justlikit Limited ("Justlikit").

B. Documents sufficient to show all employees, including agents and independent contractors, of RTMUK LimitedLLC, between October 1, 2020, and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of RTMUK Limited LLC, between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by RTMUK Limited LLC, between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms 1 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money RTMUK Limited LLC, received from one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities between October 1, 2020, and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks), retained copies of any bank checks (cashier or teller checks) and any audit trail reports.

H. Federal and state tax returns filed by RTMUK Limited LLC, for tax years 2020 and 2021.

I. For the period from October 1, 2020, to September 30, 2022**,** all documents and communications relating to one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities including, but not limited to:

1. Documents and communications related to work to be done and/or done on behalf of, one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

2. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

J. Documents sufficient to show work performed by RTMUK Limited LLC, for one or more of Justlikit, AMMC, the Parscale Entities, the Trump Entities, the Surabian Entities, and/or the Coby Entities.

K. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, related to, or referencing: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (4) election fraud; and/or (5) an "Election Defense Fund."

L. All agreements, including drafts and final agreements, between or among RTMUK Limited, LLC regarding fundraising efforts to take place on or between November 3, 2020, and June 30, 2021, that would either be premised on allegations of election fraud and/or an "Election Defense Fund" and/or variations thereof, including, but not limited to, agreements as to how monies raised would be divided and/or spent.

M. With regard to fundraising emails, text messages, or other solicitations ("fundraising material") sent between November 3, 2020, and June 30, 2021, for any of the Trump Entities, Parscale Entities, and/or American Made Media which either referred to election fraud and/or to an "Election Defense Fund":

1. All documents related to the drafting, planning, creation, and distribution of the fundraising material, including, but not limited to, documents sufficient to show all individuals who were involved in the drafting, planning, creation, and distribution of those emails;

2. Documents sufficient to show every person who reviewed and/or caused the fundraising material to be transmitted;

3. All documents that provide any support for or contradict any of the statements alleging election fraud set forth in the fundraising material;

4. Documents sufficient to show any contracts or agreements to publish, disseminate, or otherwise distribute the fundraising material;

5. Documents sufficient to show all entities paid to disseminate or otherwise distribute the fundraising material;

6. Statistical analysis related to the reach, audience, effectiveness of, and donations received from, the fundraising material; and/or

7. To the extent the fundraising media referenced an unnamed person who purportedly witnessed election fraud: (1) documents sufficient to identify that individual and (2) all communications with or about that individual.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent RTMUK Limited LLC, by anyone other than RTMUK Limited LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 20, 2022

VIA Electronic Mail

Christopher Miller

Re: Grand Jury Subpoena #GJ2022121397654
USAO #2022R00150

Dear Christopher Miller:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Mary L. Dohrmann*_____

Mary L. Dohrmann
Assistant Special Counsel
601 D Street NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Christopher Miller

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: December 20, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Mary L. Dohrmann, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022121397654
USAO #2022R00150
Preparer: [redacted]

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121397654 dated December 20, 2022, signed by Assistant Special Counsel Mary L. Dohrmann, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022121397654

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or

by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period October 1, 2020, through the present, all documents and communications:

1. Relating to the Certification.

2. Relating to or constituting any evidence (a) tending to show that there was fraud of any kind in or relating to the 2020 Presidential Election, or (b) used or relied upon to support any claim of fraud in relation to the 2020 Presidential Election.

3. Relating to any information conveyed to you or to any other person challenging, rebutting, undercutting, tending to show, or claiming that there was not fraud in the 2020 Presidential Election, or claiming or tending to show that any allegation of fraud was unfounded, baseless, or incorrect in whole or in part.

4. Submitted to, received from, or involving any local, state, or federal public official relating to (a) any claim of fraud in relation to the 2020 Presidential Election, including any presentation made to any such public official regarding the 2020 Presidential Election, or (b) any effort to persuade any such public official to change or affect the results of the 2020 Presidential Election, or delay certification of the results of that election.

5. To, from, with, or involving any member of law enforcement relating to any allegation of fraud or lack of fraud in the 2020 Presidential Election;

6. Relating to the signing, mailing, or delivery of any document purporting to be a Certificate certifying electoral votes in favor of Donald J. Trump and/or Michael R. Pence.

7. Relating to any effort, plan, or attempt to have any person serve as an Elector in favor of Donald J. Trump and/or Michael R. Pence.

8. Relating to any strategies or options for ensuring the certification of Donald J. Trump as the victor of the 2020 Presidential Election.

9. Relating to any claim that the Vice President and/or the President of the Senate had the authority to reject or choose not to count presidential electors, to delay the certification of electors, to adjourn the Certification, or to direct that a State or States reconsider or re-evaluate its slate of presidential electors.

10. To, from, with, or including any of the following, regardless of subject matter:

    a. Arizona: Nancy Cottle, Loraine Pellegrino, Tyler Bowyer, Jake Hoffman, Anthony Kern, James Lamon, Robert Montgomery, Samuel Moorhead, Greg Safsten, Kelli Ward, Michael Ward, Karen Fann, or Thomas Lane;

    b. Georgia: Joseph Brannan, James “Ken” Carroll, Vikki Townsend Consiglio, Carolyn Hall Fisher, Burt Jones, Gloria Kay Godwin, David G. Hanna, Mark W. Hennessy, Mark Amick, John Downey, Cathleen Alston Latham, Daryl Moody, Brad Carver, David Shafer, Shawn Still, C.B. Yadav, John A. Isakson, Patrick Gartland, CJ Pearson, Susan Holmes, or Robert Sinners;

    c. Michigan: Kathleen Berden, Rose Rook, Mayra Rodriguez, Hank Choate, Meshawn Maddock, Matt Maddock, Mari-Ann Henry, John Haggard, Clifford Frost, Kent Vanderwood, Stanley Grot, Marian Sheridan, Timothy King, James Renner, Michele Lundgren, Amy Facchinello, Ken Thompson, Terry

Lynn Land, Gerald Wall, or Shawn Flynn;

d. New Mexico: Jewll Powdrell, Deborah W. Maestas, Lupe Garcia, Rosie Tripp, Anissa Ford-Tinnin, Harvey Yates, or Steve Pearce;

e. Nevada: Michael J. McDonald, James DeGraffenreid, Durward James Hindle III, Jesse Law, Shawn Meehan, or Eileen Rice;

f. Pennsylvania: Bill Bachenberg, Lou Barletta, Tom Carroll, Ted Christian, Chuck Coccodrilli, Bernadette Comfort, Sam DeMarco III, Marcela Diaz-Myers, Christie DiEsposti, Josephine Ferro, Charlie Gerow, Kevin Harley, Leah Hoopes, Ash Khare, Andre McCoy, Lisa Patton, Pat Poprik, Andy Reilly, Suk Smith, Calvin Tucker, Robert Asher, Robert Gleason, Thomas Marino, Lance Stange, Lawrence Tabas, Christine Torretti, or Carolyn Welsh;

g. Wisconsin: Andrew Hitt, Kelly Ruh, Carol Brunner, Edward Scott Grabins, Bill Feehan, Robert F. Spindell, Jr., Kathy Kiernen, Darryl Carlson, Pam Travis, Mary Buestrin, or Tom Schreibel;

B. For the period of October 1, 2020, through January 20, 2021, regardless of subject matter, all documents and communications to, from, with, or including:

1. Any member, employee, or agent of the United States Department of Justice ("DOJ"), or any component, branch, litigating unit, or office of DOJ.
2. Bernard Kerik
3. Mike Roman
4. James Troupis
5. Jenna Ellis
6. Joe DiGenova
7. John Eastman
8. Kenneth Chesebro
9. Rudy Giuliani
10. Sidney Powell
11. Victoria Toensing
12. Cleta Mitchell
13. Bruce Marks
14. Boris Epshteyn
15. Justin Clark
16. Matt Morgan
17. Joshua Findlay

C. For the period of October 1, 2020, through January 20, 2021, all documents and communications relating to any compensation, monetary or otherwise, provided to or received from any individual listed in paragraph III.B.2 through III.B.17 of this subpoena.

D. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in or attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

E. All documents and communications relating to any compensation received or provided, monetary or otherwise, for or related to (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; and/or (3) the Rally.

F. All documents and communications relating to the Save America PAC, including, but not limited to, documents related to the formation of the Save America PAC, the funding of the Save America PAC, and/or the use of money received by the Save America PAC.

G. All documents and communications relating to any fundraising efforts premised, in part or whole, upon (1) efforts to contest the 2020 election; (2) the certification of the January 2020 election; and/or (3) the Rally.

H. For the period October 1, 2020, through the present, documents sufficient to show any email accounts, social media accounts, telephone numbers, messaging applications, or other methods of electronic communication that you used.

I. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

Subpoenaed materials may be produced to:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

Thomas Datwyler

Re: Grand Jury Subpoena #GJ2022121297598
USAO #2022R00150

Dear Thomas Datwyler:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Thomas Datwyler

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022121297598
USAO #2022R00150
Preparer: [redacted]

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297598 dated December 12, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

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a. Text data relating to transactions shall be produced within a data file:
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a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

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b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

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Signature of Server

_____
Address of Server

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(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of
certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022121297598

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

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II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents and communications relating to American Voting Rights Foundation from inception to September 30, 2022, including, but not limited to:

1. Documents and communications related to the formation of American Voting Rights Foundation;

2. Any agreements between American Voting Rights Foundation and any entity;

3. Documents and communications related to any monies received by American Voting Rights Foundation;

4. Documents and communications related to any monies paid or distributed by American Voting Rights Foundation;

5. Any invoices received by and/or paid by American Voting Rights Foundation;

6. Documents and communications related to one or more of Conservative Partnership Institute, Inc., Conservative Partnership Center, LLC, Save America, Save American Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC; Donald J. Trump for President, Inc.; Cyber Ninjas, Stratech, LLC; Cyfir, LLC; WAKE Technology Services, Inc., Compass Legal Services, Paracorp, Inc. d/b/a Parasec, and/or Scott Sigman, Esquire.

B. All documents and communications between or among one or more of you, Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to [redacted] received from Conservative Partnership Institute, Inc., including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

December 12, 2022

VIA Electronic Mail

American Voting Rights Foundation

Re: Grand Jury Subpoena #GJ2022121297589
USAO #2022R00150

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
601 D Street, NW
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: American Voting Rights Foundation

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, January 5, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: December 12, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
601 D Street N.W.
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ2022121297589
USAO #2022R00150
Preparer: [redacted]

PLEASE Read FIN-1 instructions before completing this form. Original and one copy required.

BILL TO: UNITED STATES ATTORNEY'S OFFICE - DISTRICT OF COLUMBIA
FINANCE SECTION, 601 D STREET N.W., WASHINGTON, D.C. 20530
[redacted]

DCN [redacted] use only) **If blank please call** [redacted]

C1 | LP

ADVICE OF OBLIGATION / RECEIVING REPORT

1. AUSA	2. SUPPORT PERSON	3.REQUESTING DIV	4. TELEPHONE CONTACT	5. USAO NUMBER	6. GJ DATE
Maria K. Vento	[redacted]	**CRIMINAL DIVISION**	[redacted]	**2022R00150**	

7. CASE NAME	8. CASE NUMBER	9. ACCOUNT TYPE	10. GJ NUMBER
		DIR **O** OCDETF **O** HCF **O** AF **O** ACE **O**	

11. ESTIMATED DELIVERY DATE	12. EST. COST **(If Over $3,000, MUST be submitted to PROCUREMENT SECT.)**	13. VENDOR NAME	14. VENDOR TAX I.D.
1/5/2023	**$75.00**	**American Voting Rights Foundation**	

15. TYPE OF OBLIGATION

O TRANSCRIPT (Grand Jury)	(25225)	**O** CONSULTANT	(25107/25LC)
O TRANSCRIPT (Court)	(25225)	● LEGAL RESEARCH	(25213)
O TRANSCRIPT (Deposition)	(25225)	**O** CERTIFIED CONVICTION	(25213)
O FILING (Copy Abstract of Title, Filing Document Required)	(25215)	**O** OTHER (Specify below)	(25107)
O STENOGRAPHY& INTERPRETER SERVICES	(25206)		

16. TYPE OF TRANSCRIPT REQUESTED	16a. For Court Reporter requests ONLY	17. TRANSCRIPT TYPE	18. TRANSCRIPT FORMAT
O REGULAR	**O** SPECIAL (Hourly – Approval Required)	**O** COPY	**O** FULL PAGE
O INTERMEDIATE	**O** EXPEDITE (Approval Required)	**O** ORIGINAL	**O** CONDENSED
O DAILY (Approval Required)	**O** EXPRESS (Approval Required) (3 Days)	**O** TAPE	**O** ELECTRONIC

19. REQUESTED ITEM

GJ2022121297589

20. SIGNATURE OF REQUESTOR	21. DATE	22. APPROVED BY (Must have OBD-234 on File)	23. DATE
Typed/Printed Name of Requestor		Typed/Printed Name of Approving Official	
24. FUNDS CERTIFICATION	25. DATE		

26. INVOICE

Number and Date of Order	Date of Delivery or Service	Articles of Service(s)	Transcript Type	Quantity	Unit Price Cost	Unit Price Per	Amount
				TOTAL			

Payee Signature: _____ Date: _____ *No payments should be made unless expenses are itemized.

27. CERTIFICATION

I certify that these goods and/or services were received on _____ (date) and accepted on _____ (date). Oral purchase was authorized and no confirming order has been issued."

_____ SIGNATURE

_____ DATE

Printed or Typed Name and Title: _____

ORIGINAL – Finance COPY – Originating Office FIN-1 07/14

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ2022121297589 dated December 12, 2022, signed by Assistant United States Attorney Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All documents and communications relating to American Voting Rights Foundation from inception to September 30, 2022, including, but not limited to:

1. Documents and communications related to the formation of American Voting Rights Foundation;

2. Any agreements between American Voting Rights Foundation and any entity;

3. Documents and communications related to any monies received by American Voting Rights Foundation;

4. Documents and communications related to any monies paid or distributed by American Voting Rights Foundation;

5. Any invoices received by and/or paid by American Voting Rights Foundation;

6. Documents and communications related to one or more of Conservative Partnership Institute, Inc., Conservative Partnership Center, LLC, Save America, Save American Joint Fundraising Committee; Trump Make America Great Again Committee; Make America Great Again PAC; Donald J. Trump for President, Inc.; Cyber Ninjas, Stratech, LLC; Cyfir, LLC; WAKE Technology Services, Inc., Compass Legal Services, Paracorp, Inc. d/b/a Parasec, and/or Scott Sigman, Esquire.

B. All documents and communications between or among one or more of Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of National Capital Bank regarding or related to [redacted] received from Conservative Partnership Institute, Inc., including the receipt of and any subsequent transfer of those funds and/or any phone calls and/or meetings regarding or related thereto.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
[redacted]
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 18, 2023

VIA Electronic Mail

Red State Partners LLC

Re: Grand Jury Subpoena #GJ20230118-E0005

Dear Sir or Madam:

Enclosed is a subpoena commanding you produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Budget Officer, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Red State Partners LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

Date: January 18, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ20230118-E0005

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230118-E0005

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

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A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Red State Partners LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Red State Partners LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Red State Partners LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Red State Partners LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Red State Partners LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and

income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by Red State Partners LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by Red State Partners LLC for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Red State Partners LLC by anyone other than Red State Partners LLC, copies of the retention agreement.

Please Return To:

Walter Giardina
Special Agent
Federal Bureau of Investigation
[redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 18, 2023

VIA Electronic Mail

Pericles, LLC

Re: Grand Jury Subpoena #GJ20230118-E0006

Dear Sir or Madam:

Enclosed is a subpoena commanding you produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Budget Officer, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*

Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Pericles, LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

Date: January 18, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room B-206
Washington, DC 20530
Phone: [redacted]
Email: [redacted]

Subpoena #GJ20230118-E0005

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230118-E0006

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Pericles, LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Pericles, LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Pericles, LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Pericles, LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Pericles, LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and

Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by Pericles, LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by Pericles, LLC for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Pericles, LLC by anyone other than Pericles, LLC, copies of the retention agreement.

Please Return To:

Walter Giardina
Special Agent
Federal Bureau of Investigation
[redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

January 19, 2023

VIA Federal Express

Paychex Business Solutions, LLC
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230119-E0060

Dear Paychex:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Paychex Business Solutions, LLC
[redacted]
Attn: Legal Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, February 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 19, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230119-E0060

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230119-E0060 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **Paychex Business Solutions, LLC**
Attn: Legal Department
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. **Entity:** Campaign Nucleus, LLC

2. **Individual:** Bradley Parscale
SSN: [redacted]
DOB: [redacted]

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed Paychex accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions
- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)

- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to Paychex
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between Paychex and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:

i. Using a delimited ASCII text data format; or
ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.
b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*
b. Authentication, such as hash coding, may be set by agreement.
c. Affidavits or certificates of authenticity may be included as part of the electronic production.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

January 19, 2023

VIA Electronic Mail

ADP TotalSoure, Inc.
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230119-E0061

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: ADP TotalSource, Inc.
[redacted]
Attn: Subpoena Processing

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, February 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 19, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230119-E0061

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230119-E0061 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Issued to: ADP TotalSource, Inc.
Attn: Subpoena Processing
[redacted]

Method of Service: Email

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. **Individual** — **Bradley Parscale**
   SSN: [redacted]
2. **Entity** — **Parscale Strategy, LLC**

Including all accounts in which the individuals/entity had signatory authority and/or the right of account access.

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed ADP accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions

- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)
- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to Paychex
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between APD and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested not to disclose the existence of this subpoena, or the fact of your compliance with it.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 19, 2023

VIA Facsimile

Bank of America
[redacted]
Fax: [redacted]

Re: Grand Jury Subpoena #GJ20230119-E0062

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, January 27, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 19, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
[redacted]
Email: [redacted]

Subpoena #GJ20230119-E0062

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230119-E0062 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America
[redacted]

Method of Service: Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 through September 30, 2022 for the following:

1. Entity Name: **Pericles, LLC**
   Address: [redacted]
   Known Account Number: [redacted]

2. Name: Vince Haley
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   - [redacted]
   - [redacted]
   - [redacted]

3. Name: Ross Worthington
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses:
   - [redacted]
   - [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to

E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 7, 2023

VIA Facsimile

JP Morgan Chase
[redacted]

Re: Grand Jury Subpoena #GJ20230123-E0066

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.
NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, February 21, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230123-E0066

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230123-E0066 dated February 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
[redacted]

Method of Service: Fax

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of November 2022 to and including January 2023 for the following:

1. Entity Name: Elections, LLC
   Address: [redacted]
   Known Account Numbers: [redacted];

2. Name: Justin Clark
   Social Security Number [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

3. Name: Stefan Passantino
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check

    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced

onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation

Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 23, 2023

VIA Facsimile

Regions Bank
[redacted]
Mail Code: [redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230123-E0067

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Regions Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, February 7, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230123-E0067

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230123-E0067 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Regions Bank
Attn: Legal Department
[redacted]
Mail Code: [redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the Present for the following:

1. Entity Name: John M Philips Client Trust Account
   Known Account Number: [redacted];

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax

notifications

- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries,

affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]

Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 24, 2023

VIA Federal Express

Paychex
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230124-E0068

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Paychex
[redacted]
Attn: Legal Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Tuesday, February 7, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 24, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230124-E0068

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230124-E0068 dated January 24, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **Paychex**
Attn: Legal Department
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. Compass Professional Inc. and/or any customer associated with National Capital Bank account [redacted].
2. Conservative Partnership Institute Inc. and/or any customer associated with National Capital Bank account [redacted].
3. Center for Renewing America Inc. and/or any customer associated with National Capital Bank account [redacted].
4. Compass Legal Services Inc. and/or any customer associated with National Capital Bank account [redacted].
5. America First Legal Foundation and/or any customer associated with National Capital Bank account [redacted].

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed Paychex accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions

- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)
- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to Paychex
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between Paychex and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 24, 2023

VIA Electronic Mail

ADP
[redacted]
Attn: Legal Compliance Department

Re: Grand Jury Subpoena #GJ20230124-E0069

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: ADP
[redacted]
Attn: Legal Compliance Department

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, February 7, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 24, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230124-E0068

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230124-E0069 dated January 24, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Issued to: ADP
Attn: Legal Compliance Department
[redacted]

Method of Service: Email [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. Elections, LLC and/or any customer associated with JPMorgan Chase bank account [redacted].
2. Conservative Partnership Institute Inc. and/or any customer associated with National Capital Bank account [redacted].
3. Center for Renewing America Inc. and/or any customer associated with National Capital Bank account [redacted].
4. Compass Legal Services Inc. and/or any customer associated with National Capital Bank account [redacted].
5. America First Legal Foundation and/or any customer associated with National Capital Bank account [redacted].

Including all accounts in which the individuals/entity had signatory authority and/or the right of account access.

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed ADP accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account

- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions
- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)
- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to ADP
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between APD and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested <u>not to disclose</u> the existence of this subpoena, or the fact of your compliance with it.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]ov
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 27, 2023

VIA Electronic Mail

ADP TotalSoure, Inc.
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230127-E0087

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: ADP TotalSource, Inc.
[redacted]
Attn: Subpoena Processing

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, February 10, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 27, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230127-E0087

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230127-E0087 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

SUBPOENA ATTACHMENT

Issued to: ADP TotalSource Inc.
[redacted]
Attn: Legal Department

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of January 2019 -Present for the following:

1. Conservative Partnership Institute Inc. and/or any customer associated with National Capital Bank account [redacted].
2. Center for Renewing America Inc. and/or any customer associated with National Capital Bank account [redacted].
3. Compass Legal Services Inc. and/or any customer associated with National Capital Bank account [redacted].
4. America First Legal Foundation and/or any customer associated with National Capital Bank account [redacted].

Including all accounts in which the individuals/entity had signatory authority and/or the right of account access.

These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.

Any and all documents pertaining to all open or closed ADP accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

- Signature cards, opening account documents
- Know Your Customer reports (KYC)
- Complete account information
- Names on the account
- Customer identification
- Corporate board authorization minutes or partnership resolutions
- Account statements and support for transactions

- All payroll records including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities
- All Withholding Exemption Certificates (Form W-4); Wage and Tax Statements (Forms W-2); and U.S. Information Returns (Forms 1099)
- Copies of all tax returns
- Copies of contracts or professional service agreements
- Copies of Earnings Records
- The method in which the above entities report payroll to ADP
- Complete records of all Certificates of Insurance including the manner in which these records were sent and who requested these records to be sent
- All correspondence including emails for the request, transfer or sending of Certificates of Insurance to and from the above listed individuals and entities and/or to third parties
- Dates of birth and social security numbers of individuals on the account
- Any and all bills, receipts, invoices, and applications

Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

Correspondence: All correspondence (including notes of calls, SMS messages and corresponding phone numbers - both origin and destination phone numbers, e-mails, and all phone numbers or e-mails) with the above persons/entities and/or with third parties regarding the above persons/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

Communications: Please include any and all correspondence between APD and the above individuals/entities or their employees regarding payroll services, workers compensation policies or other services provided. This correspondence should also include contact regarding payroll reporting and Certificate of Insurance requests.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in
non-proprietary electronic form and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD).* Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested not to disclose the existence of this subpoena, or the fact of your compliance with it.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room B-206
Washington, DC 20530

January 31, 2023

VIA Federal Express

Republic Bank
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230131-E0089

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Republic Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Tuesday, February 14, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 31, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230131-E0089

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230131-E0089 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **REPUBLIC BANK**
ATTN:LEGAL DEPARTMENT
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 1, 2020 - through Present for the following:

1. Name (First Middle Last): **Nicholas Luna**
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Address: [redacted]

2. Entity Name: **CIC VENTURES LLC**
   Address: [redacted]
   Address: [redacted]
   Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from

accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including

electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

January 31, 2023

VIA Hand Delivery

Wells Fargo Bank, N.A.

Re: Grand Jury Subpoena #GJ20230131-E0090

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N.A.

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, February 14, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: January 31, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230131-E0090

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230131-E0090 dated January 19, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **Wells Fargo Bank, N.A.**

Method of Service: Hand Delivery

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 1, 2020 - through Present for the following:

1. Name (First Middle Last): **Anthony Dolan**
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Address: [redacted]

2. Entity Name: **TVR, LLC**
   Address: [redacted]
   Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries,

affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Federal Express

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230201-E0092

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER

IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0092

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230201-E0092 dated February 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of November 2020 to and including January 31, 2023 for the following:

1. Entity Name: Donald J Trump for President Inc./Make America Great Again (MAGA) PAC
   Address: [redacted]
   Known Account Numbers: Ending in [redacted]; Ending in [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g.

the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Federal Express

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230201-E0093

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER

IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room B-206
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0093

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230201-E0093 dated February 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation requested for the entities and time periods listed below:

1. Entity Name: Trump Make America Great Again Committee (TMAGAC) - Contribution Refund & Rev
   Address: [redacted]
   Account Numbers: [redacted];
   Time Period Requested: **September 2022 to and including January 2023**

2. Entity Name: Trump Make America Great Again Committee (TMAGAC) - OPR
   Address: [redacted]
   Account Numbers: [redacted]
   Time Period Requested: **May 2021 to and including January 2023**

3. Entity Name: Trump Make America Great Again Committee (TMAGAC) – Vendor Refunds, Aegis Rev, Conv Rev, Merkle Revenue, DJTFP Holding, Stripe Revenue
   Address: [redacted]
   Account Numbers: [redacted]
   Time Period Requested: **June 2022 to and including January 2023**
   or declaration of account closure.

4. Entity Name: Trump Make America Great Again Committee (TMAGAC) – Stripe; RNC;
   Address: [redacted]
   Account Numbers: [redacted]
   Time Period Requested: **November 2020 to and including January 2023**
   or declaration of account closure.

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:
Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,

- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Federal Express

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230201-E0094

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER

IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0094

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230201-E0094 dated February 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of August 2022 to and including January 2023 for the following:

1. Entity Name: Save America
   Address: [redacted]
   Known Account Numbers: [redacted]

2. Entity Name: Save America Joint Fundraising Committee
   Address: [redacted]
   Known Account Numbers: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

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CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]

Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Federal Express

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230201-E0095

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER

IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0095

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230201-E0095 dated February 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: Federal Express

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of November 1, 2020 to October 31, 2021 for the following:

1. Entity Name: Republican National Committee: RNC Contribution Account; RNC Recount; RNC OPR
   Known Account Numbers: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g.

the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Electronic Mail

Stripe, Inc.
[redacted]
Attn: Legal Order Processing

Re: Grand Jury Subpoena #GJ20230201-E0096

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Stripe, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0096

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230201-E0096 dated February 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are _____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Stripe, Inc.
Attn: Legal Order Processing
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of November 2020 to the Present for the following:

1. Entity Name: Trump Make America Great Again Committee (TMAGAC) – Stripe Rev
   Address: [redacted]
   Known Account Numbers: Chain Bridge Bank # [redacted]

The aforementioned bank account information should include, but is not be limited to, the following documents and/or records:

a) Names (including subscriber names, user names, and screen names)
b) Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses)
c) Any and all related accounts, either open or closed
d) Length of service (including start date) and types of service utilized
e) Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifier ("MEID"), Mobile Identification Numbers ("MIN"), Subscriber Identity Modules ("SIM"), Mobile Subscriber Integrated Services Digital Network Number ("MSISDN"), International Mobile Subscriber Identifiers ("IMSI"), or International Mobile Station Equipment Identities ("IMEI"))
f) Means and source of payment for such service (including any credit card or bank account number) and billing records
g) Complete transactional information for all payments received, withdrawals made, and payments sent; including but not limited to items, services, or goods purchased.
h) Any detail of links or advertisements used by the merchant for users to access and send payments
i) All financial account information pertaining to Stripe, Inc. Verification process as it relates to the above-stated entities and affiliates

j) All correspondence with the above-referenced entities and/or with third parties regarding the above entities
k) Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol ("IP") addresses) associated with those sessions
l) All memoranda, files, or records relating to meetings or communications relating to the above-entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Facsimile

Bank of America
[redacted]
Fax: [redacted]

Re: Grand Jury Subpoena #GJ20230201-E0097

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0097

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230201-E0097 dated February 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America
[redacted]

Method of Service: Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 through January 31, 2023 for the following:

1. Entity Name: Gabriel Strategies LLC
   Known Address: [redacted]
   Known Account Number: [redacted]

2. Name: Robert Gabriel
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

These records should include, at a minimum, current balances and the following:

<u>CHECKING/SAVINGS ACCOUNT RECORDS:</u>

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but <u>not limited to</u>:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Operational Support Technician Leanne Kunkel
Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
[redacted]
703-686-6361
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Electronic Mail

Cameron Seward

Re: Grand Jury Subpoena #GJ20230201-E0098

Dear Mr. Seward:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*

Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Cameron Seward

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury # [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, February 16, 2023 at 9:00 AM

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0098

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230201-E0098

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Electronic Mail

Patrick Corrigan

Re: Grand Jury Subpoena #GJ20230201-E0099

Dear Mr. Corrigan:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*

Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Patrick Corrigan

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0099

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230201-E0099

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 1, 2023

VIA Electronic Mail

Ed Corrigan

Re: Grand Jury Subpoena #GJ20230201-E0100

Dear Mr. Corrigan:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*

Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Ed Corrigan

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 16, 2023 at 9:00 AM

Date: February 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230201-E0100

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230201-E0100

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

Febuary 7, 2023

VIA Electronic Mail

WinRed
[redacted]

Re: Grand Jury Subpoena #GJ20230207-E0109

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: WinRed
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Tuesday, February 21, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230207-E0109

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230207-E0109 dated February 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in

non-proprietary electronic form and shall include text data and image data held:

   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: WinRed [redacted]

Method of Service: Via counsel: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of November 2020 to the Present for the following:

1. Entity Name: Trump Make America Great Again Committee (TMAGAC); Chain Bridge account # [redacted]
2. Entity Name: Save America; Chain Bridge account # [redacted]
3. Entity Name: Save America Joint Fundraising Committee; Chain Bridge account # [redacted]

The aforementioned account information should include, but is not be limited to, the following documents and/or records:

a) Names (including subscriber names, user names, and screen names)
b) Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses)
c) Any and all related accounts, either open or closed
d) Length of service (including start date) and types of service utilized
e) Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifier ("MEID"), Mobile Identification Numbers ("MIN"), Subscriber Identity Modules ("SIM"), Mobile Subscriber Integrated Services Digital Network Number ("MSISDN"), International Mobile Subscriber Identifiers ("IMSI"), or International Mobile Station Equipment Identities ("IMEI"))
f) Means and source of payment for such service (including full account numbers for any debit card, credit card or bank account number) and billing records
g) Complete transactional information for all payments received, withdrawals made, and payments sent; including but not limited to items, services, or goods purchased.

h) Any detail of links or advertisements used by the merchant for users to access and send payments
i) All financial account information pertaining to WinRed verification process as it relates to the above-stated entities and affiliates
j) Correspondence or memoranda from contributors about contributions
k) All correspondence with the above-referenced entities and/or with third parties regarding the above entities
l) Records of session times and durations, and the temporarily assigned network addresses (such as Internet Protocol ("IP") addresses) associated with those sessions
m) All memoranda, files, or records relating to meetings or communications relating to the above-entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Special Agent Walter B. Giardina
Operational Support Technician Leanne Kunkel
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 8, 2023

VIA Electronic Mail

Silicon Valley Bank
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230208-E0110

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Silicon Valley Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230208-E0110

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230208-E0110 dated February 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Silicon Valley Bank
Attn: Legal Department
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 through October 2022 for the following:

1. Name: Gary Coby
   Social Security Number: [redacted]
   Date of Birth: [redacted]
2. Account Number: [redacted]
3. Account Number: [redacted]
4. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

<u>CHECKING/SAVINGS ACCOUNT RECORDS:</u>

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but <u>not limited to</u>:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]

Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 8, 2023

VIA Electronic Mail

Morgan Stanley
[redacted]

Re: Grand Jury Subpoena #GJ20230208-E0111

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Morgan Stanley
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230208-E0111

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230208-E0111 dated February 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Morgan Stanley
Attn: Custodian of Records
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 through October 31, 2022 for the following:

1. Name: Gary Coby
   Social Security Number: [redacted]
   Date of Birth: [redacted]

2. Entities:
   a. Direct Persuasion, LLC
      Known Address: [redacted]
      Known Address: [redacted]
   b. Opn Sesame, LLC
      Known Address: [redacted]
      Known Address: [redacted]

These records should include, at a minimum, current balances and the following:

<u>CHECKING/SAVINGS/INVESTMENT ACCOUNT RECORDS:</u>

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but <u>not limited to</u>:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank

account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including

electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 8, 2023

VIA Facsimile

Fidelity Investments/National Financial Services LLC
[redacted]
Attn: Legal Operations
Fax: [redacted]

Re: Grand Jury Subpoena #GJ20230208-E0112

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases

where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Fidelity Investments/National Financial Services LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230208-E0112

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230208-E0112 dated February 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Fidelity Investments/National Financial Services LLC
Attn: Legal Operations
[redacted]

Method of Service: Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 through October 31, 2022 for the following:

1. Name: Gary Coby
   Social Security Number: [redacted]
   Date of Birth: [redacted]

2. Entities:
   a. Direct Persuasion, LLC
      Known Address: [redacted]
      Known Address: [redacted]
   b. Opn Sesame, LLC
      Known Address: [redacted]
      Known Address: [redacted]

These records should include, at a minimum, current balances and the following:

<u>CHECKING/SAVINGS/INVESTMENT ACCOUNT RECORDS:</u>

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but <u>not limited to</u>:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing,

magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

Febuary 8, 2023

VIA Electronic Mail

Bill.com, LLC
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230208-E0113

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bill.com, LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230208-E0113

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230208-E0113 dated February 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

Issued to: Bill.com, LLC
Attn: Legal Department
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 1, 2020 to October 31, 2022

1. Individuals:
    a. Gary Coby
    SSN: [redacted]
    DOB: [redacted]
2. Entities
    a. Opn Sesame, LLC;
    Known Accounts Associated: Silicon Valley Bank #[redacted]
    b. Direct Persuasion, LLC
    Known Accounts Associated: Silicon Valley Bank #[redacted]

<u>These records should include, at a minimum, all accounts in which the individual/entity had signatory authority and/or the right of account access.</u>

Any and all documents pertaining to all open or closed Bill.com accounts in the name of or under signature authority of any of the named parties or entities including, but not limited to:

1. Any and all account opening and verification information, including agreements, applications, contracts, photocopies of driver's license information, address, telephone number, SSN, date of birth, email, ANI information, and/or any other information received from the account holder.

2. <u>Transaction Information</u>: Monthly Statements and Transaction history including full 16-digit credit/debit card numbers and transaction histories, historical GPS/Geographical, and IP Address information obtained from transactions. Copies of dispute documents, including any correspondence from account holder. Notes

regarding services provided/adjustments made to merchant account. Information related to the following services:

a. Accounts Payable

i. All imported bills
ii. All workflows associated with the accounts
iii. All automated or manual payments to vendors
iv. All synced data including vendor services, invoices, accounts, and "syncs" between Bill.com and any synced accounting software

b. Accounts Receivable

i. All invoices
ii. The manner and means by which invoices were sent, including all destination email or US mail addresses
iii. All reoccurring invoices
iv. All customers "nudged" for payment
v. All receiving bank account information
vi. All account receivables on autopilot
vii. All synced accounts

c. Credit and Expense Management

i. All business credit accounts
ii. All spend management or expense management products or accounts

3. Account inquiries: IP addresses (including Port ID if available), http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

4. Correspondence: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities including notes of calls, SMS messages and corresponding phone numbers (both origin and destination phone numbers), e-mails, and all phone numbers or e-mails used by account holder.

5. Related accounts: Any additional accounts (to including information requested in #1 through #4 above) identified by phone number, email, cookie, IP address, or other proprietary means.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.
b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do not encrypt individual file contents if the container is encrypted.*
b. Authentication, such as hash coding, may be set by agreement.
c. Affidavits or certificates of authenticity may be included as part of the electronic production.

You are requested not to disclose the existence of this subpoena, or the fact of your compliance with it.

Information/questions can be furnished/directed to:

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]

Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

Febuary 10, 2023

VIA Electronic Mail

Save America Joint Fundraising Committee

Re: Grand Jury Subpoena #GJ20230210-E0119

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Save America Joint Fundraising Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 10, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230210-E0119

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230210-E0119 dated February 10, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period of August 1, 2020 to the present, all documents to/from/cc/bcc, referring to, referencing, or relating to one or more of the following entities and/or individuals:

1. The Oath Keepers
2. The Proud Boys
3. 1st Amendment Praetorian
4. Brandon Akerill
5. Joseph Biggs
6. Charles Bowman
7. Thomas Caldwell
8. Donovan Crowell
9. Joseph Hackett
10. Kenneth Harrelson
11. Joshua James
12. Robert Patrick Lewis
13. Connie Meggs
14. Kelly Meggs
15. Roberto Minuta
16. David Moerschel
17. Ethan Nordean
18. Dominic Pezzola
19. Ivan Raiklin
20. Zachary Rehl
21. Elmer Stewart Rhodes III
22. Kellye SoRelle
23. Rusell Taylor
24. Henry "Enrique" Tarrio a/k/a Enrique Tarrio
25. Brian Ulrich
26. Edward Vallejo
27. Jessica Watkins

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

Febuary 10, 2023

VIA Electronic Mail

Save America

Re: Grand Jury Subpoena #GJ20230210-E0120

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Save America

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 10, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230210-E0120

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230210-E0120 dated February 10, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period of August 1, 2020 to the present, all documents to/from/cc/bcc, referring to, referencing, or relating to one or more of the following entities and/or individuals:

1. The Oath Keepers
2. The Proud Boys
3. 1st Amendment Praetorian
4. Brandon Akerill
5. Joseph Biggs
6. Charles Bowman
7. Thomas Caldwell
8. Donovan Crowell
9. Joseph Hackett
10. Kenneth Harrelson
11. Joshua James
12. Robert Patrick Lewis
13. Connie Meggs
14. Kelly Meggs
15. Roberto Minuta
16. David Moerschel
17. Ethan Nordean
18. Dominic Pezzola
19. Ivan Raiklin
20. Zachary Rehl
21. Elmer Stewart Rhodes III
22. Kellye SoRelle
23. Rusell Taylor
24. Henry "Enrique" Tarrio a/k/a Enrique Tarrio
25. Brian Ulrich
26. Edward Vallejo
27. Jessica Watkins

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

Febuary 10, 2023

VIA Electronic Mail

Make America Great Again PAC

Re: Grand Jury Subpoena #GJ20230210-E0121

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Make America Great Again PAC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 10, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230210-E0121

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230210-E0121 dated February 10, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period of August 1, 2020 to present, all documents to/from/cc/bcc, referring to, referencing, or relating to one or more of the following entities and/or individuals:

1. The Oath Keepers
2. The Proud Boys
3. 1st Amendment Praetorian
4. Brandon Akerill
5. Joseph Biggs
6. Charles Bowman
7. Thomas Caldwell
8. Donovan Crowell
9. Joseph Hackett
10. Kenneth Harrelson
11. Joshua James
12. Robert Patrick Lewis
13. Connie Meggs
14. Kelly Meggs
15. Roberto Minuta
16. David Moerschel
17. Ethan Nordean
18. Dominic Pezzola
19. Ivan Raiklin
20. Zachary Rehl
21. Elmer Stewart Rhodes III
22. Kellye SoRelle
23. Rusell Taylor
24. Henry "Enrique" Tarrio a/k/a Enrique Tarrio
25. Brian Ulrich
26. Edward Vallejo
27. Jessica Watkins

B. For the period, November 3, 2020 to present, all documents to/from/cc/bcc the email address [redacted]@donaldtrump.[redacted].

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

Febuary 10, 2023

VIA Electronic Mail

Trump Make America Great Again Committee

Re: Grand Jury Subpoena #GJ20230210-E0122

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Trump Make America Great Again Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, February 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 10, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230210-E0122

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230210-E0122 dated February 10, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period of August 1, 2020 to the present, all documents to/from/cc/bcc, referring to, referencing, or relating to one or more of the following entities and/or individuals:

1. The Oath Keepers
2. The Proud Boys
3. 1st Amendment Praetorian
4. Brandon Akerill
5. Joseph Biggs
6. Charles Bowman
7. Thomas Caldwell
8. Donovan Crowell
9. Joseph Hackett
10. Kenneth Harrelson
11. Joshua James
12. Robert Patrick Lewis
13. Connie Meggs
14. Kelly Meggs
15. Roberto Minuta
16. David Moerschel
17. Ethan Nordean
18. Dominic Pezzola
19. Ivan Raiklin
20. Zachary Rehl
21. Elmer Stewart Rhodes III
22. Kellye SoRelle
23. Rusell Taylor
24. Henry "Enrique" Tarrio a/k/a Enrique Tarrio
25. Brian Ulrich
26. Edward Vallejo
27. Jessica Watkins

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 10, 2023

VIA Electronic Mail

Ed Corrigan

Re: Grand Jury Subpoena #GJ20230210-E0123

Dear Mr. Corrigan:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Ed Corrigan

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, February 21, 2023 at 9:00 AM

Date: February 10, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230210-E0123

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230210-E0123

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 10, 2023

VIA Electronic Mail

Cameron Seward

Re: Grand Jury Subpoena #GJ20230210-E0124

Dear Mr. Seward:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Cameron Seward

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, February 21, 2023 at 9:00 AM

Date: February 10, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230210-E0124

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230210-E0124

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 15, 2023

VIA Federal Express

Truist Financial (SunTrust)
c/o Corporation Service Company
[redacted]
Attn: Legal Fulfillment

Re: Grand Jury Subpoena #GJ20230214-E0130

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Truist Financial (SunTrust)
c/o Corporation Service Company
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, March 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230214-E0130

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230214-E0130 dated February 15, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Truist Financial (SunTrust)
Attn: Legal Fulfillment
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the Present for the following:

1. Individuals:
    a. Name: Justin Clark
    Social Security Number [redacted]
    Date of Birth: [redacted]
    Associated Addresses: [redacted]

    b. Name: Stefan Passantino
    Social Security Number: [redacted]
    Date of Birth: [redacted]
    Associated Addresses: [redacted]

2. Known Account: # [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations

Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 15, 2023

VIA Federal Express

Navy Federal Credit Union
[redacted]
Attn: Subpoena Department

Re: Grand Jury Subpoena #GJ20230214-E0131

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Navy Federal Credit Union
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230214-E0131

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230214-E0131 dated February 15, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Navy Federal Credit Union
Attn: Subpoena Department
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the Present for the following:

1. Individuals:
    a. Name: Justin Clark
    Social Security Number [redacted]
    Date of Birth: [redacted]
    Associated Addresses: [redacted]

    b. Name: Stefan Passantino
    Social Security Number: [redacted]
    Date of Birth: [redacted]
    Associated Addresses: [redacted]

2. Known Account: #[redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations

Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 15, 2023

VIA Electronic Mail

Gabriel Strategies LLC

Re: Grand Jury Subpoena #GJ20230214-E0132

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Gabriel Strategies LLC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230214-E0132

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230214-E0132 dated February 14, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Gabriel Strategies LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Gabriel Strategies LLC between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Gabriel Strategies LLC between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Gabriel Strategies LLC between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Gabriel Strategies LLC received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or

bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by Gabriel Strategies LLC for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022**,** all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by Gabriel Strategies LLC for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Gabriel Strategies LLC by anyone other than Gabriel Strategies LLC, copies of the retention agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 15, 2023

Robert Gabriel

Re: Grand Jury Subpoena #GJ20230214-E0133

Dear Mr. Gabriel:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Robert Gabriel

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 2, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: February 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230214-E0133

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230206-E0104

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant

messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period October 1, 2020, through the present, all documents and communications:

1. Relating to the Certification.

2. Relating to or constituting any evidence (a) tending to show that there was fraud of any kind in or relating to the 2020 Presidential Election, or (b) used or relied upon to support any claim of fraud in relation to the 2020 Presidential Election.

3. Relating to any information conveyed to you or to any other person challenging, rebutting, undercutting, tending to show, or claiming that there was not fraud in the 2020 Presidential Election, or claiming or tending to show that any allegation of fraud was unfounded, baseless, or incorrect in whole or in part.

4. Submitted to, received from, or involving any local, state, or federal public official relating to (a) any claim of fraud in relation to the 2020 Presidential Election, including any presentation made to any such public official regarding the 2020 Presidential Election, or (b) any effort to persuade any such public official to change or affect the results of the 2020 Presidential Election, or delay certification of the results of that election.

5. To, from, with, or involving any member of law enforcement relating to any allegation of fraud or lack of fraud in the 2020 Presidential Election;

6. Relating to the signing, mailing, or delivery of any document purporting to be a Certificate certifying electoral votes in favor of Donald J. Trump and/or Michael R. Pence.

7. Relating to any effort, plan, or attempt to have any person serve as an Elector in favor of Donald J. Trump and/or Michael R. Pence.

8. Relating to any strategies or options for ensuring the certification of Donald J. Trump as the victor of the 2020 Presidential Election.

9. Relating to any claim that the Vice President and/or the President of the Senate had the authority to reject or choose not to count presidential electors, to delay the certification of electors, to adjourn the Certification, or to direct that a State or States reconsider or re-evaluate its slate of presidential electors.

10. To, from, with, or including any of the following, regardless of subject matter:

    a. Arizona: Nancy Cottle, Loraine Pellegrino, Tyler Bowyer, Jake Hoffman, Anthony Kern, James Lamon, Robert Montgomery, Samuel Moorhead, Greg Safsten, Kelli Ward, Michael Ward, Karen Fann, or Thomas Lane;

    b. Georgia: Joseph Brannan, James "Ken" Carroll, Vikki Townsend Consiglio, Carolyn Hall Fisher, Burt Jones, Gloria Kay Godwin, David G. Hanna, Mark W. Hennessy, Mark Amick, John Downey, Cathleen Alston Latham, Daryl Moody, Brad Carver, David Shafer, Shawn Still, C.B. Yadav, John A. Isakson, Patrick Gartland, CJ Pearson, Susan Holmes, or Robert Sinners;

    c. Michigan: Kathleen Berden, Rose Rook, Mayra Rodriguez, Hank Choate, Meshawn Maddock, Matt Maddock, Mari-Ann Henry, John Haggard, Clifford Frost, Kent Vanderwood, Stanley Grot, Marian Sheridan, Timothy King, James Renner, Michele Lundgren, Amy Facchinello, Ken Thompson, Terry Lynn Land, Gerald Wall, or Shawn Flynn;

    d. New Mexico: Jewll Powdrell, Deborah W. Maestas, Lupe Garcia, Rosie Tripp, Anissa Ford-Tinnin, Harvey Yates, or Steve Pearce;

    e. Nevada: Michael J. McDonald, James DeGraffenreid, Durward James Hindle III, Jesse Law, Shawn Meehan, or Eileen Rice;

    f. Pennsylvania: Bill Bachenberg, Lou Barletta, Tom Carroll, Ted Christian, Chuck Coccodrilli, Bernadette Comfort, Sam DeMarco III, Marcela Diaz-Myers, Christie DiEsposti, Josephine Ferro, Charlie Gerow, Kevin Harley, Leah Hoopes, Ash Khare, Andre McCoy, Lisa Patton, Pat Poprik, Andy Reilly, Suk Smith, Calvin Tucker, Robert Asher, Robert Gleason, Thomas Marino, Lance Stange, Lawrence Tabas, Christine Torretti, or Carolyn Welsh;

    g. Wisconsin: Andrew Hitt, Kelly Ruh, Carol Brunner, Edward Scott Grabins, Bill Feehan, Robert F. Spindell, Jr., Kathy Kiernen, Darryl Carlson, Pam Travis, Mary Buestrin, or Tom Schreibel;

B. For the period of October 1, 2020, through January 20, 2021, regardless of subject matter, all documents and communications to, from, with, or including:

1. Any member, employee, or agent of the United States Department of Justice ("DOJ"), or any component, branch, litigating unit, or office of DOJ.
2. Bernard Kerik
3. Mike Roman
4. James Troupis
5. Jenna Ellis
6. Joe DiGenova
7. John Eastman
8. Kenneth Chesebro
9. Rudy Giuliani
10. Sidney Powell
11. Victoria Toensing
12. Cleta Mitchell
13. Bruce Marks
14. Boris Epshteyn
15. Justin Clark
16. Matt Morgan
17. Joshua Findlay

C. For the period of October 1, 2020, through January 20, 2021, all documents and communications relating to any compensation, monetary or otherwise, provided to or received from any individual listed in paragraph III.B.2 through III.B.17 of this subpoena.

D. For the period of January 1, 2020, through January 20, 2021, any and all information, communications, documents, or records relating to Dominion Voting Systems Corp., Smartmatic, Smartmatic USA, the ownership or control of any such company or company's parent, subsidiary, or affiliate, any executive of any such company, any voting machines, voting hardware, voting software, or the accuracy, inaccuracy, reliability, lack of reliability, manipulation, lack of manipulation, or vulnerability of any voting hardware, software, or system used or planned to be used in the 2020 Presidential Election.

E. For the period of November 3, 2020, through January 20, 2021, any statistical, quantitative, or mathematical analysis, assessment, or review of votes, vote tallies, voting patterns, votes cast, voting quantities, or polling data relating to the 2020 Presidential Election.

F. Any and all records, documents, and communications related to any audit, recount, or canvass of the results of the 2020 Presidential Election.

G. For the period of January 1, 2020, through January 20, 2021, all records, documents, and communications relating to the actual, expected, anticipated, or predicted tendency

of any method of voting (*e.g.*, in-person voting, versus early voting, versus absentee voting) to favor or disfavor any candidate in the 2020 Presidential Election.

H. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in, compensation for attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

I. For the period of October 1, 2020, through June 30, 2021, all documents and communications relating to any fundraising premised upon, or compensation received or provided, monetary or otherwise, for or related to: (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; (3) the Rally; (4) references to or claims of election fraud; and/or (5) an "Election Defense Fund."

J. All documents and communications relating to Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, including, but not limited to, documents related to the formation, funding, and/or use of money received by Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

K. All agreements, including drafts and final agreements, between or among you personally or any entity with which you are associated, on the one hand, and one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, on the other hand.

L. Documents sufficient to show any work that you or an entity associated with you did for Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee from November 3, 2020 through June 30, 2022.

M. Documents sufficient to show any compensation received, monetary or otherwise, by you or an entity with which you are associated from Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you personally, copies of the retention agreement.

O. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 21, 2023

VIA Facsimile

JP Morgan Chase
[redacted]

Re: Grand Jury Subpoena #GJ20230221-E0142

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER

IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, March 7, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 21, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230221-E0142

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230221-E0142 dated February 21, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
[redacted]

Method of Service: Fax

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 to October 2022 for the following:

1. Name: Nicholas Luna
   Social Security Number [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]
   Known Account: # [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries,

affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]

Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 21, 2023

VIA Facsimile

USAA Federal Savings Bank
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230221-E0143

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house. NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE

ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: USAA Federal Savings Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, March 7, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: February 21, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230221-E0143

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230221-E0143 dated February 21, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: USAA Federal Savings Bank
Attn: Subpoena Processing
[redacted]

Method of Service: FedEx or Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 to October 2022 for the following:

1. Name: Sean Dollman
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]
   Known Account: #[redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file. -

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries,

affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]

Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
[redacted]
Washington, DC 20530

March 1, 2023

Via Email

Iterable, Inc.
[redacted]

Re: Grand Jury Subpoena #GJ20230222-E0150

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq., electronic communications services providers responding to a grand jury subpoena for production of certain records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may not be made for records or other information relating to telephone toll records and listings described in 18 U.S.C. § 2703(c)(2). Please note that under the Act, the Department of Justice will not reimburse expenses incurred for the production of information kept in the ordinary course of business. An exception can be made if compliance with a grand jury subpoena requires the expenditure of unusual effort or resources. In that circumstance, reimbursement of the "reasonable cost" of such services can be made if the government and subpoena recipient mutually agree on the amount, or if the court orders reimbursement.

If you believe that you are entitled to reimbursement, please send a full and complete itemized statement for all costs in an invoice that makes clear the basis for the reimbursement request.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED SCO-212 FORM, AND (3) A COPY OF THE SUBPOENA.

Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. **Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.**

Enclosed please find a nondisclosure order from the court directing Iterable, Inc. not to notify any person (including the subscriber or customer) of the existence or content of this subpoena. You are directed not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure on your part could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE APPLICATION OF USA FOR 2705(b) NONDISCLOSURE ORDER FOR GRAND JURY SUBPOENA #GJ20230222-E0150	Case No. 23-sc-494 Chief Judge Beryl A. Howell **Under Seal**

ORDER

This matter having come before the Court pursuant to an application under 18 U.S.C. § 2705(b) requesting an order directing Iterable, Inc. ("PROVIDER"), an electronic communication and/or remote computing service provider located in San Francisco, CA, not to notify any other person of the existence of subpoena number **GJ20230222-E0150** issued by the United States on behalf of a federal Grand Jury empaneled in the United States District Court for the District of Columbia (the "Subpoena"), the Court finds reasonable grounds to believe that such disclosure will result in destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation. *See* 18 U.S.C. § 2705(b)(3)-(5).

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 2705(b), PROVIDER and its employees shall not disclose the existence of the Subpoena to any other person (except attorneys for PROVIDER for the purpose of receiving legal advice) for a period of one year (commencing on the date of this Order), unless the period of nondisclosure is later modified by the Court.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

SO ORDERED.

Date: February 28, 2023

Beryl A. Howell

BERYL A. HOWELL
CHIEF JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Iterable, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230222-E0150

U.S. Department of Justice
Washington, D.C. 20530

Request for Communications Content, Records or Other Information Under the Electronic Communications Privacy Act (ECPA). (Authorization, Purchase Order and Receiving Report)

This form shall be used when requesting communications content, records, or other information from electronic communications or remote computing service providers under the ECPA.

1 Tracking Number:	2 Date Order Prepared:	3 SCO Reference Number:
GJ20230222-E0150		**N/A**

Section A – Authorization and Purchase Order

4 Name and Address of Service Provider:
Iterable, Inc.
[redacted]

Funding Certification & Authorization:

A. _____
Budget Official Signature Funding Available Date

B. _____
Approving Official Signature Date

5 Deliver Records To:
Maria K. Vento
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530

Send Completed SCO-212 Form & Invoice To:
[redacted]

6 Return Date:

7 Remarks: Do not proceed with compliance if the total cost will exceed without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor:	9 Telephone Number:	10 Date of request:

Section B - ECPA Service Provider Invoice

11A Invoice Number: / 11B Tax ID Number:		Quantity	Unit Price Cost	Unit Price Per	Amount
11C Service(s)/Records Provided:					

The costs above (or on the attached invoice) represent direct costs and have been incurred in searching for, assembling, reproducing or otherwise providing the requested information.

12 Signature of Service Provider Representative:	13 Date Signed:	Total Amount Claimed By Service Provider	

Section C - Receiving Report

		16 Disallowance *(See Attached)*	
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Service Provider	

18 Electronic Communications Privacy Act - Public Law 99-508
(18 U.S.C. 2701-2712) Request Pursuant To: *(Only One Section at Left Should Be Checked)*

SECTION		OBJECT CLASS
☐	2702 Voluntary Disclosure	2570
☒	2703 Compelled Disclosure	2570
☐	Search Warrant	2570
☒	Grand Jury Subpoena	2570
☐	Court Order	2570
☐	Administrative or Judicial Subpoena	2570
☐	2704 Request for Information Following Preservation	2570

19 Signature of Approving Official: Date:

20 Funding Source

Accounting Code:

Program

21 Other Accounting/Fund Information:
Program Code: Project Code:
YREGDOC:
Call Number (if applicable):
OBL Month (YRMO):
Tax ID Number:

22 Remarks:

The costs above (or on the attached invoice) appear to be reasonably necessary and to have been directly incurred in searching for, assembling, reproducing or otherwise providing requested information

Signature of Department of Justice Representative Date

FORM SCO-212
EEB. 2014

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230222-E0150 dated March 1, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit

ATTACHMENT

Issued to: Iterable, Inc.
[redacted]

For the period of account inception to present, please provide the records and information identified below for all accounts associated with the following domains, email addresses, individuals, and/or entities:

1. [redacted].donaldtrump.[redacted]
2. [redacted]@victory.trump.[redacted]
3. [redacted]@theamericanvoter.[redacted]
4. [redacted]@mail.secureconservative.[redacted]
5. [redacted]@ourpresident45.[redacted]
6. Trump Make America Great Again Committee
7. The Republican National Committee
8. Donald J. Trump for President
9. DataPier
10. Alex Cannon
11. Sean Dollman
12. Darren Centinello

Records and information to be provided:

1. Names (including subscriber names, usernames, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. E-mail addresses (including all active e-mail addresses linked to subscriber's domain names and hosted by Iterable);
4. Domains registered to the subscriber;
5. Local and long-distance telephone connection records (including connection records related to text messages sent and received);
6. Records of session times and durations, and the temporarily assigned network addresses (such as IP addresses) associated with those sessions;
7. Length of service (including start date) and types of service utilized;
8. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifier ("MEID"), Mobile Identification Numbers ("MIN"), Subscriber Identity Modules ("SIM"), Mobile Subscriber Integrated Services Digital Network Number (MSISDN), International Mobile Subscriber Identifiers ("IMSI"), or International Mobile Station Equipment Identities ("IMEI"));

9. Other subscriber numbers or identities (including temporarily assigned network addresses and registration IP addresses, including carrier grade natting addresses or ports);
10. Hosting service and/or any e-mail service provider linked to the purchased domain name;
11. Means and source of payment for such service (including any credit card or bank account number) and billing records.

NOTE: **IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:**

Jeremy S. Desor
Special Agent, FBI
Washington Field Office
[redacted]

IF YOU CHOOSE TO COMPLY WITH THIS SUBPOENA BY PRODUCING THE MATERIALS TO A FEDERAL AGENT, PLEASE ALSO REVIEW AND EXECUTE THE ATTACHED CERTIFICATION UNDER FEDERAL RULES OF EVIDENCE 803(6) AND 902(11). COMPLETION OF THIS CERTIFICATION MAY ELIMINATE THE NEED FOR APPEARANCE OF A RECORDS CUSTODIAN AT A FUTURE DATE.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 23, 2023

VIA Electronic Mail

Patrick Corrigan

Re: Grand Jury Subpoena #GJ20230223-E0154

Dear Mr. Corrigan:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Patrick Corrigan

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Tuesday, March 7, 2023 at 9:00 AM

Date: February 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230223-E0154

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230223-E0154

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

February 23, 2023

VIA Electronic Mail

Wesley Denton

Re: Grand Jury Subpoena #GJ20230223-E0155

Dear Mr. Denton:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if

there are any scheduling problems. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wesley Denton

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, March 7, 2023 at 9:00 AM

Date: February 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230223-E0155

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230223-E0155

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

American Express/Datamark
[redacted]
Attn: Subpoena Response Unit

Re: Grand Jury Subpoena #GJ20230302-E0161

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: American Express/Datamark
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0161

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0161 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: American Express/Datamark
Subpoena Response Unit
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, - accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

Bank of America, N.A.
[redacted]
Attn: Legal Order Processing

Re: Grand Jury Subpoena #GJ20230302-E0162

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0162

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0162 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America, N.A.
Legal Order Processing
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, -accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Electronic Mail

Barclays Bank of Delaware
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230302-E0163

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Barclays Bank of Delaware
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0163

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0163 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Barclays Bank of Delaware
Subpoena Processing
[redacted]

Method of Service: Email to [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Electronic Mail

Citibank, N.A.
[redacted]
Attn: Legal Services Intake Unit

Re: Grand Jury Subpoena #GJ20230302-E0164

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Citibank, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0164

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0164 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Citibank, N.A.
Attn: Legal Services Intake Unit
[redacted]

Method of Service: Email to [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Electronic Mail

Discover Financial Services
[redacted]
Attn: Custodian of Records

Re: Grand Jury Subpoena #GJ20230302-E0165

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Discover Financial Services
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0165

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0165 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Discover Financial Services
Attn: Custodian of Records
[redacted]

Method of Service: Email to [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

Elan Financial Services
[redacted]
Attn: Custodian of Records

Re: Grand Jury Subpoena #GJ20230302-E0166

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Elan Financial Services
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0166

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0166 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Elan Financial Services
Custodian of Records
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)

    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

JP Morgan Chase
[redacted]
Attn: National Subpoena Processing Center

Re: Grand Jury Subpoena #GJ20230302-E0167

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0167

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0167 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
National Subpoena Processing Center
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:

    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

PNC Bank
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230302-E0168

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: PNC Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0168

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0168 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: PNC Bank
Attn: Subpoena Processing
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)

    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

TIAA Bank
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230302-E0169

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: TIAA Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0169

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0169 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: TIAA Bank
Legal Department
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 2, 2023

VIA Federal Express

USAA Federal Savings Bank
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230302-E0170

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: USAA Federal Savings Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 2, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230302-E0170

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230302-E0170 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: USAA Federal Savings Bank
Attn: Subpoena Processing
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

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Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
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- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
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  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

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TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

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B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

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General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 6, 2023

VIA Electronic Mail

The McEntee Group

Re: Grand Jury Subpoena #GJ20230306-E0187

Dear Sir or Madam:

Enclosed is a subpoena commanding you to appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter. We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: The McEntee Group

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 16, 2023 at 9:00 AM

Date: March 6, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230306-E0187

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230306-E0187

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 7, 2023

Larry Weitzner

Re: Grand Jury Subpoena #GJ20230307-E0188

Dear Mr. Weitzner:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not

to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Larry Weitzner

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0188

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230307-E0188

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of October 1, 2020 through January 20, 2021, all agreements, draft or final, between you and/or Jamestown Associates and any associates, agents, and/or authorized representatives thereof, on the one hand, and one or more of the following individuals and/or entities, and/or their associates, agents, and/or authorized representatives, on the other hand (collectively, the "Entities and Individuals"):

1. The Republican National Committee;
2. Save America;
3. Save America Joint Fundraising Committee;
4. Trump Make America Great Again Committee;
5. Make America Great Again PAC;
6. Donald J. Trump for President, Inc.;
7. Jason Miller;
8. Jared Kushner; and/or
9. Donald J. Trump.

B. Documents sufficient to identify any individual who did any work on any advertisements that were discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Jamestown Associates to be aired between November 3, 2020 and January 20, 2021 on any advertisements that were discussed with, drafted for, and/or prepared for the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

D. Documents sufficient to show the money paid to air any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

E. For the time period of October 1, 2020 through January 20, 2021, all documents and communications related to budgets and/or billing for any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, invoices sent and payments received.

F. For the time period of October 1, 2020 through January 20, 2021, all drafts, including, but not limited to, drafts of both copy and recordings, of any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to,

"Overwhelming," "Stop the Steal," "On Tape," and December 11-31 – DJTFP network plan.xlsx, and all communications about the same.

G. For the time period of November 3, 2020 through January 20, 2021, all documents and communications relating to any of the statements made in any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

H. For the time period of November 3, 2020 through January 20, 2021, all communications between or among you, Carlos Cruz, and/or any other person that worked for or with Jamestown Associates on any advertising strategy and/or advertisements that were discussed with, drafted for, and/or prepared the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

I. For the time period of November 3, 2020 through January 20, 2021, all communications about any advertising strategy and/or advertisements that were prepared for the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited, communications with/to/from/cc/bcc or referencing and/or any notes of communications with:

1. Benjamin Angle;
2. Gary Coby;
3. Alex Cannon;
4. Stewart Crossland;
5. Boris Ephystein;
6. James Fitzpatrick;
7. Newt Gingrich;
8. Rudy Giuliani;
9. Ken Kurson;
10. Jared Kushner;
11. Ronna McDaniel;
12. John McLaughlin;
13. Mark Meadows;
14. Molly Michael;
15. Jason Miller;
16. Tim Murtaugh;
17. Zach Parkinson;
18. Michael Roman;

19. William Stepien;

20. Evan Tracey;

21. Donald J. Trump;

22. Harris Sikes Media, or any employee, agent, contractor, or representative of Harris Sikes Media;

23. The Republican National Committee, or any employee, agent, contractor, or representative of the Republican National Committee;

24. Donald J. Trump for President, Inc.; Save America; Save America Joint Fundraising Committee; Make America Great Again PAC; and/or Trump Make America Great Again Committee, or any employee, agent, contractor, or representative of any of those entities;

25. Any media buyer or representative or agent thereof; and/or

26. Any media outlet or representative or agent of any media outlet, including, but not limited to CBS; RFD TV; Fox News; Fox Business News; OANN, Newsmax, and/or Sinclair.

J. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you and copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 7, 2023

Jamestown Associates

Re: Grand Jury Subpoena #GJ20230307-E0189

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Jamestown Associates

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0189

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230307-E0189 dated March 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of October 1, 2020 through January 20, 2021, all agreements, draft or final, between Jamestown Associates and any associates, agents, and/or authorized representatives thereof, on the one hand, and one or more of the following individuals and/or entities, and/or their associates, agents, and/or authorized representatives, on the other hand (collectively, the "Entities and Individuals"):

1. The Republican National Committee;
2. Save America;
3. Save America Joint Fundraising Committee;
4. Trump Make America Great Again Committee;
5. Make America Great Again PAC;
6. Donald J. Trump for President, Inc.;
7. Jason Miller;
8. Jared Kushner; and/or
9. Donald J. Trump.

B. Documents sufficient to identify any individual who did any work on any advertisements that were discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Jamestown Associates to be aired between November 3, 2020 and January 20, 2021 on any advertisements that were discussed with, drafted for, and/or prepared for the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

D. Documents sufficient to show the money paid to air any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

E. For the time period of October 1, 2020 through January 20, 2021, all documents and communications related to budgets and/or billing for any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, invoices sent and payments received.

F. For the time period of October 1, 2020 through January 20, 2021, all drafts, including, but not limited to, drafts of both copy and recordings, of any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals to be aired between November 3, 2020 and January 20, 2021, including, but not limited to,

"Overwhelming," "Stop the Steal," "On Tape," and December 11-31 – DJTFP network plan.xlsx, and all communications about the same.

G. For the time period of November 3, 2020 through January 20, 2021, all documents and communications relating to any of the statements made in any advertisements discussed with, drafted for, and/or prepared for the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

H. For the time period of November 3, 2020 through January 20, 2021, all communications between or among any owners, employees, agents, or contractors of Jamestown Associates on any advertising strategy and/or advertisements that were discussed with, drafted for, and/or prepared the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape."

I. For the time period of November 3, 2020 through January 20, 2021, all communications about any advertising strategy and/or advertisements that were prepared for the Entities and Individuals, including, but not limited to, "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited, communications with/to/from/cc/bcc or referencing and/or any notes of communications with:

1. Benjamin Angle;
2. Gary Coby;
3. Alex Cannon;
4. Stewart Crossland;
5. Boris Ephystein;
6. James Fitzpatrick;
7. Newt Gingrich;
8. Rudy Giuliani;
9. Ken Kurson;
10. Jared Kushner;
11. Ronna McDaniel;
12. John McLaughlin;
13. Mark Meadows;
14. Molly Michael;
15. Jason Miller;
16. Tim Murtaugh;
17. Zach Parkinson;
18. Michael Roman;
19. William Stepien;

20. Evan Tracey;

21. Donald J. Trump;

22. Harris Sikes Media, or any employee, agent, contractor, or representative of Harris Sikes Media;

23. The Republican National Committee, or any employee, agent, contractor, or representative of the Republican National Committee;

24. Donald J. Trump for President, Inc.; Save America; Save America Joint Fundraising Committee; Make America Great Again PAC; and/or Trump Make America Great Again Committee, or any employee, agent, contractor, or representative of any of those entities;

25. Any media buyer or representative or agent thereof; and/or

26. Any media outlet or representative or agent of any media outlet, including, but not limited to CBS; RFD TV; Fox News; Fox Business News; OANN, Newsmax, and/or Sinclair.

J. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 7, 2023

VIA Federal Express

Iberia Bank
[redacted]
Attn: Legal Services

Re: Grand Jury Subpoena #GJ20230307-E0190

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted]@usdoj.gov.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Iberia Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0190

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230307-E0190 dated March 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Iberia Bank
Attn: Legal Services
[redacted]

Method of Service: FedEx
Email: [redacted]
Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to October 31, 2022 for the following individuals:

1. Bradley Parscale
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. Candice Parscale
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 8, 2023

VIA Facsimile

Bank of America
[redacted]
Fax: [redacted]

Re: Grand Jury Subpoena #GJ20230307-E0193

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0193

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230307-E0193 dated March 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America
[redacted]

Method of Service: Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 through September 30, 2022 for the following:

1. Entity Name: **DirectSnd LLC**
   Address: [redacted]
   Known Acct #: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.

- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and

representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 8, 2023

VIA Federal Express

Citizens Bank, N.A.
One Citizens Drive
[redacted]
Attn: Citizens Subpoena/Summons Processing

Re: Grand Jury Subpoena #GJ20230307-E0194

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Citizens Bank, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0194

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230307-E0194 dated March 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Citizens Bank, NA
Attn: Citizens Subpoena/Summons Processing
[redacted]

Method of Service: Fed-Ex

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 through March 2021 for the following:

1. Entity Name: **Simpatico Software Systems, Inc**
   Address: [redacted]
   Known Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 8, 2023

VIA Electronic Mail

PNC Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230307-E0195

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: PNC Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0195

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230307-E0195 dated March 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: **PNC Bank**
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 – March 2021 for the following:

1. Entity Name: Berkeley Research Group, LLC
   Known Address: [redacted]

2. Entity Name: East Bay Dispute & Advisory, LLC
   Known Address: [redacted]

3. Known Acct: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

Special Agent Dan Mehochko, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]
Forensic Accountant Brian Marchelwski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 9, 2023

VIA Federal Express

Bay State Savings Bank
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230309-E0201

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bay State Savings Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 23, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 9, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230307-E0193

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230309-E0201 dated March 9, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bay State Savings Bank
Attn: Legal Department
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to September 30, 2022 for the following individuals:

Andrew Surabian
SSN: [redacted]
DOB: [redacted]
Associated Addresses: [redacted]

Account Number (including, but not limited to): [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and

source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

FP1 Strategies

Re: Grand Jury Subpoena #GJ20230314-E0217

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: FP1 Strategies

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230314-E0217

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230314-E0217 dated March 15, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards,

and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period November 3, 2020, through and including January 20, 2021, regarding any and all work done for, with, or at the request of one or more of the following: the Republican National Committee, The Trump Make America Great Again PAC, Donald J. Trump for President Inc., Save America and/or the Save America Joint Fundraising Committee, or their agents, contractors, and/or representatives (collectively, the "Entities"):

1. Documents sufficient to show all FP1 employees, agents, or representatives who did any work with, for, or at the request of the Entities;

2. Any pitch decks, PowerPoints, and/or presentations discussing the digital marketing strategy provided to the Entities;

3. All agreements or contracts between or among FP1 Strategies, or its agents, contractors and/or representatives and one or more of the Entities;

4. All invoices sent to the Entities and any records of payment or lack of payment of those invoices;

5. All records of payments made *on behalf of* the Entities;

6. All communications between FP1, any of its employees, agents, and/or contractors (including, but not limited to Chris Georgia), and anyone affiliated, directly or indirectly, with any of the Entities (including but not limited to Austin Boedigheimer, Kevin Zambrano, Gary Coby, Jared Kushner, Sean Dollman, and/or Alex Cannon);

7. All documents reflecting any information shared either orally or in writing with the Entities regarding fundraising performance metrics or campaign Key Performance Indicators ("KPIs"), including but not limited to:

    a. Digital marketing KPIs for email including, but not limited to:

        a. Digital engagement;

        b. Click-through rates;

        c. Open rates for emails;

        d. Unsubscribes;

        e. Conversion or sign-up rates;

        f. Donor acquisition rates; and/or

g. Donor acquisition cost and/or return on investment;

b. Digital marketing KPIs for social media, including but not limited to:

a. Digital engagement;

b. Click-through rates (CTRs);

c. Likes, follows, or shares;

d. Unsubscribes;

e. Conversion or sign-up rates;

f. Donor acquisition rates; and/or

g. Donor acquisition cost and/or return on investment;

c. Search engine optimization KPIs, including but not limited to daily search traffic metrics including total unique visitors.

8. Daily digital marketing reports or summaries provided to the Entities; and

9. Campaign metrics including vote goals and voter turnout.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 17, 2023

Christopher Georgia

Re: Grand Jury Subpoena #GJ20230314-E0218

Dear Mr. Georgia:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted] Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Christopher Georgia

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 17, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230314-E0218

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230314-E0218

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards,

and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period November 3, 2020, through and including January 20, 2021, regarding any and all work done for, with, or at the request of one or more of the following: the Republican National Committee, The Trump Make America Great Again PAC, Donald J. Trump for President Inc., Save America and/or the Save America Joint Fundraising Committee, or their agents, contractors, and/or representatives (collectively, the "Entities"):

1. Documents sufficient to show all FP1 employees, agents, or representatives who did any work with, for, or at the request of the Entities;

2. Any pitch decks, PowerPoints, and/or presentations discussing the digital marketing strategy provided to the Entities;

3. All agreements or contracts between or among FP1 Strategies, or its agents, contractors and/or representatives and one or more of the Entities;

4. All invoices sent to the Entities and any records of payment or lack of payment of those invoices;

5. All records of payments made *on behalf of* the Entities;

6. All communications between FP1, any of its employees, agents, and/or contractors (including, but not limited to Chris Georgia), and anyone affiliated, directly or indirectly, with any of the Entities (including but not limited to Austin Boedigheimer, Kevin Zambrano, Gary Coby, Jared Kushner, Sean Dollman, and/or Alex Cannon);

7. All documents reflecting any information shared either orally or in writing with the Entities regarding fundraising performance metrics or campaign Key Performance Indicators ("KPIs"), including but not limited to:

    a. Digital marketing KPIs for email including, but not limited to:

        a. Digital engagement;

        b. Click-through rates;

        c. Open rates for emails;

        d. Unsubscribes;

        e. Conversion or sign-up rates;

        f. Donor acquisition rates; and/or

g. Donor acquisition cost and/or return on investment;

b. Digital marketing KPIs for social media, including but not limited to:

a. Digital engagement;

b. Click-through rates (CTRs);

c. Likes, follows, or shares;

d. Unsubscribes;

e. Conversion or sign-up rates;

f. Donor acquisition rates; and/or

g. Donor acquisition cost and/or return on investment;

c. Search engine optimization KPIs, including but not limited to daily search traffic metrics including total unique visitors.

8. Daily digital marketing reports or summaries provided to the Entities; and

9. Campaign metrics including vote goals and voter turnout.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Walter Giardina
Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Alex Murglin

Re: Grand Jury Subpoena #GJ20230315-E0220

Dear Mr. Murglin:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Alex Murglin

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230315-E0220

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230315-E0220

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Michael Ahrens; Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters; and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Kevin Zambrano

Re: Grand Jury Subpoena #GJ20230315-E0222

Dear Mr. Zambrano:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Kevin Zambrano

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230315-E0222

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230315-E0222

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Michael Ahrens; Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; and/or Richard Walters;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Michael Ahrens

Re: Grand Jury Subpoena #GJ20230315-E0223

Dear Mr. Ahrens:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Michael Ahrens

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230315-E0223

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230315-E0223

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Hanna Allred

Re: Grand Jury Subpoena #GJ20230315-E0224

Dear Ms. Allred:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Hanna Allred

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230315-E0224

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230315-E0224

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Michael Ahrens; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters; and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Austin Boedigheimer

Re: Grand Jury Subpoena #GJ20230315-E0225

Dear Mr. Boedigheimer:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Austin Boedigheimer

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230315-E0225

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230315-E0225

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
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b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

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a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
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b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

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B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

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receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

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1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Michael Ahrens; Hanna Allred; Joe Ascioti; Jeff Aubin; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters; and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Cassie Docksey

Re: Grand Jury Subpoena #GJ20230315-E0226

Dear Ms. Docksey:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Cassie Docksey

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230315-E0226

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230315-E0226

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Michael Ahrens; Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

VIA Electronic Mail

Atlassian Inc.
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230316-E0227

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq., electronic communications services providers responding to a grand jury subpoena for production of certain records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may not be made for records or other information relating to telephone toll records and listings described in 18 U.S.C. § 2703(c)(2). Please note that under the Act, the Department of Justice will not reimburse expenses incurred for the production of information kept in the ordinary course of business. An exception can be made if compliance with a grand jury subpoena requires the expenditure of unusual effort or resources. In that circumstance, reimbursement of the "reasonable cost" of such services can be made if the government and subpoena recipient mutually agree on the amount, or if the court orders reimbursement.

If you believe that you are entitled to reimbursement, please send a full and complete itemized statement for all costs in an invoice that makes clear the basis for the reimbursement request.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED SCO-212 FORM, AND (3) A COPY OF THE SUBPOENA.

Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. **Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.**

Enclosed please find a nondisclosure order from the court directing Atlassian Inc. not to notify any person (including the subscriber or customer) of the existence or content of this subpoena. You are directed not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure on your part could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE APPLICATION OF USA FOR 2705(b) NONDISCLOSURE ORDER FOR GRAND JURY SUBPOENA #GJ20230316-E0227	Case No. 23-sc-690 Chief Judge James E. Boasberg **Filed Under Seal**

ORDER

This matter having come before the Court pursuant to an application under 18 U.S.C. § 2705(b) requesting an order directing Atlassian, Inc. ("PROVIDER"), an electronic communication and/or remote computing service provider located in San Francisco, CA, not to notify any other person of the existence of subpoena number **GJ20230316-E0227** issued by the United States on behalf of a federal Grand Jury empaneled in the United States District Court for the District of Columbia (the "Subpoena"), the Court finds reasonable grounds to believe that such disclosure will result in destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation. *See* 18 U.S.C. § 2705(b)(3)-(5).

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 2705(b), PROVIDER and its employees shall not disclose the existence of the Subpoena to any other person (except attorneys for PROVIDER for the purpose of receiving legal advice) for a period of one year (commencing on the date of this Order), unless the period of nondisclosure is later modified by the Court.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

SO ORDERED.

Date: 3/20/23

JAMES E. BOASBERG
CHIEF JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Atlassian Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Tuseday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Senior Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230316-E0227

U.S. Department of Justice
Washington, D.C. 20530

Request for Communications Content, Records or Other Information Under the Electronic Communications Privacy Act (ECPA). (Authorization, Purchase Order and Receiving Report)

This form shall be used when requesting communications content, records, or other information from electronic communications or remote computing service providers under the ECPA.

1 Tracking Number:	2 Date Order Prepared:	3 SCO Reference Number:
GJ20230316-E0227		**N/A**

Section A – Authorization and Purchase Order

4 Name and Address of Service Provider:
Atlassian Inc.
[redacted]

Funding Certification & Authorization:

A. _____
Budget Official Signature Funding Available Date

B. _____
Approving Official Signature Date

5 Deliver Records To:
Maria K. Vento
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530

Send Completed SCO-212 Form & Invoice To:
[redacted]

6 Return Date:

7 Remarks: Do not proceed with compliance if the total cost will exceed without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor:	9 Telephone Number:	10 Date of request:

Section B - ECPA Service Provider Invoice

11A Invoice Number: / 11B Tax ID Number:		Quantity	Unit Price Cost	Unit Price Per	Amount
11C Service(s)/Records Provided:					

The costs above (or on the attached invoice) represent direct costs and have been incurred in searching for, assembling, reproducing or otherwise providing the requested information.

12 Signature of Service Provider Representative:	13 Date Signed:	Total Amount Claimed By Service Provider	
		16 Disallowance *(See Attached)*	
Section C - Receiving Report			
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Service Provider	

18 Electronic Communications Privacy Act - Public Law 99-508
(18 U.S.C. 2701-2712) Request Pursuant To: *(Only One Section at Left Should Be Checked)*

SECTION		OBJECT CLASS
☐	2702 Voluntary Disclosure	2570
☒	2703 Compelled Disclosure	2570
☐	Search Warrant	2570
☒	Grand Jury Subpoena	2570
☐	Court Order	2570
☐	Administrative or Judicial Subpoena	2570
☐	2704 Request for Information Following Preservation	2570

19 Signature of Approving Official: Date:

20 Funding Source

Accounting Code:

Program

21 Other Accounting/Fund Information:
Program Code: Project Code:
YREGDOC:
Call Number (if applicable):
OBL Month (YRMO):
Tax ID Number:

22 Remarks:

The costs above (or on the attached invoice) appear to be reasonably necessary and to have been directly incurred in searching for, assembling, reproducing or otherwise providing requested information

Signature of Department of Justice Representative Date

FORM SCO-212
EEB. 2014

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230316-E0227 dated March 20, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit

ATTACHMENT

Issued to: Atlassian Inc.
Attn: Legal Department
[redacted]

For the period of account inception to present, please provide the records and information identified below for all Trello accounts associated with the following domains, email addresses, individuals, and/or entities:

1. The Republican National Committee
2. Trump Make America Great Again Committee
3. The Republican National Committee
4. Donald J. Trump for President
5. Accounts associated with the domain @gop.com, including accounts with users associated with the following email addresses:
    a. [redacted]@gop.com
    b. [redacted]@gop.com
    c. [redacted]@gop.com
    d. [redacted]@gop.com
    e. [redacted]@gop.com

Records and information to be provided:

1. Names (including subscriber names, usernames, and screen names);
2. Addresses (including mailing addresses, residential addresses, business addresses, and e-mail addresses);
3. E-mail addresses (including all active e-mail addresses linked to subscriber's domain names and hosted by Atlassian);
4. Domains registered to the subscriber;
5. Local and long-distance telephone connection records (including connection records related to text messages sent and received);
6. Records of session times and durations, and the temporarily assigned network addresses (such as IP addresses) associated with those sessions;
7. Length of service (including start date) and types of service utilized;
8. Telephone or instrument numbers (including MAC addresses, Electronic Serial Numbers ("ESN"), Mobile Electronic Identity Numbers ("MEIN"), Mobile Equipment Identifier ("MEID"), Mobile Identification Numbers ("MIN"), Subscriber Identity Modules ("SIM"), Mobile Subscriber Integrated Services Digital Network Number (MSISDN), International Mobile Subscriber Identifiers ("IMSI"), or International Mobile Station Equipment Identities ("IMEI"));
9. Other subscriber numbers or identities (including temporarily assigned network addresses and registration IP addresses, including carrier grade natting addresses or ports);
10. Hosting service and/or any e-mail service provider linked to the purchased domain name;

11. Means and source of payment for such service (including any credit card or bank account number) and billing records.

Please Return To:

Jeremy S. Desor, Walter Giardina
Special Agents
Federal Bureau of Investigation
[redacted]

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

Alex Blinkoff

Re: Grand Jury Subpoena #GJ20230317-E0232

Dear Mr. Blinkoff:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Alex Blinkoff

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230317-E0232

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230317-E0232

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

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a. Text data relating to transactions shall be produced within a data file:
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   i. Produced in individual graphic data files with any associated endorsements; and
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a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

Karla Howard

Re: Grand Jury Subpoena #GJ20230317-E0235

Dear Ms. Howard:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Karla Howard

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230317-E0235

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230317-E0235

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

Ashley Grace Novak

Re: Grand Jury Subpoena #GJ20230317-E0236

Dear Ms. Novak:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Ashley Grace Novak

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230317-E0236

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230317-E0236

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

StraTech Solutions, a/k/a StraTech LLC
[redacted]

Re: Grand Jury Subpoena #GJ20230320-E0242

Dear Sir or Madam:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: StraTech Solutions, a/k/a StraTech LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230320-E0242

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230320-E0242

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using

applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between StraTech Solutions, LLC and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC;
5. Donald J. Trump for President, Inc.;
6. American Voting Rights Foundation;
7. Cyber Ninjas, Inc.;
8. Michael Roman;
9. Steven Miller;
10. Cleta Mitchell;
11. Christina Bobb;
12. Thomas Datwyler;
13. Douglas Logan;
14. Arizona State Senate; and/or
15. Any member of the Arizona State Senate and/or an any affiliate thereof.

B. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of StraTech Solutions, LLC related to the November 2020 election and/or for or on behalf of Cyber Ninjas, Inc.

C. Documents sufficient to show the work done by StraTech Solutions, LLC for Cyber Ninjas, Inc. related to the November 2020 election.

D. Documents sufficient to show how much money StraTech Solutions, LLC received, directly or indirectly, from one or more of the Cyber Ninjas, Inc., Conservative Partnership Institute, American Voting Rights Foundation, Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between November 1, 2020 and July 31, 2021.

E. All documents related to StraTech Solutions, LLC Invoice Number [redacted].

F. All documents and communications regarding payment for work done by or on behalf of StraTech Solutions, LLC for or on behalf of Cyber Ninjas, Inc.

G. All documents and communications related to American Voting Rights Foundation.

H. All documents and communications between or among, or referencing any communications between or among, one or more of Donald J. Trump, Mark Meadows, Cleta Mitchell, Stephen Miller, Patrick Corrigan, Edward Corrigan, Thomas Datwyler, Michael Roman, Christina Bobb, Douglas Logan and/or any representative or employee of any of those individuals or any representative or employee of National Capital Bank regarding or related Cyber Ninjas, Inc. and/or the November 2020 election, including, but not limited to the [redacted] StraTech Solutions, LLC received from American Voting Rights Foundation on or about July 29, 2021.

I. All documents and communications relating to one or more of the American Voting Rights Foundation, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to money received, directly or indirectly, by one or more of Cyber Ninjas, Inc., the American Voting Rights Foundation, Conservative Partnership Institute, Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of American Voting Rights Foundation and/or Cyber Ninjas, Inc.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Cyber Ninjas, Inc., the American Voting Rights Foundation, Conservative Partnership Institute, Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, Donald J. Trump for President, Inc., and/or the Trump Make America Great Again Committee.

J. To the extent any attorney or law firm is being paid directly or indirectly to represent StraTech Solutions, LLC by anyone other than StraTech Solutions, LLC, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 21, 2023

VIA Electronic Mail

Merrill Lynch, Pierce, Fenner & Smith, Inc.
[redacted]

Re: Grand Jury Subpoena #GJ20230321-E0247

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Merrill Lynch, Pierce, Fenner & Smith, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, March 30, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 21, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230321-E0247

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230321-E0247 dated March 2, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Merrill Lynch, Pierce, Fenner & Smith, Inc.
[redacted]

Method of Service: Email

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following individuals:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

3. Rudy Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source

of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, -accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual

graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 28, 2023

VIA Federal Express

JP Morgan Chase
[redacted]

Re: Grand Jury Subpoena #GJ20230322-E0248

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 11, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 28, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230322-E0248

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230322-E0248 dated March 28, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
National Subpoena Processing Center
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to October 31, 2021 for the following individuals:

Trump Media & Technology Group Corp
EIN [redacted]
Associated Address (es): [redacted]

Including, but not limited to account number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from

accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave.
NW Room [redacted]
Washington, DC 20530

March 23, 2023

Iterable, Inc.
[redacted]

Re: Grand Jury Subpoena #GJ20230322-E0249

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Iterable, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230322-E0249

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230322-E0249 dated March 23, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. Documents sufficient to show Iterable's Terms of Service and/or Community Standards and Guidelines or any Iterable policies that govern its relationships with its customers and/or what content Iterable would send or cause to be sent on behalf of its customers that were in effect between November 3, 2020 and January 20, 2021 (collectively, "Iterable's Policies").

B. Any agreements, draft or final, between Iterable, on the one hand, and one or more of DataPier, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee and/or any employees, agents, and/or representatives, including but not limited to Alex Cannon, Sean Dollman, and/or Darren Centinello (collectively, "the Entities and Individuals"), on the other hand, that were entered into between October 1, 2020 and January 20, 2021

C. For the time period November 3, 2020 through January 20, 2021, all documents and communications between Iterable and/or any of its employees, agents, and/or representatives, on the one hand, and any of the Entities and Individuals, on the other hand, including, but not limited to, documents and communications related to any of the following:

1. All fundraising emails or draft or potential fundraising emails (collectively "Fundraising Emails") the Entities and Individuals provided to, or caused to be provided to, Iterable or any of its employees, agents, and/or representatives for Iterable to send out between November 3, 2020 and January 20, 2021 (collectively "Fundraising Emails"), including, but not limited to all drafts and any documents or communications discussing any draft or final emails.

2. Whether or not the fundraising emails in C.1 complied with Iterable's Polices, including, but not limited to, concerns or discussions of inflammatory language, violence, false and/or misleading information, and/or support or lack thereof for any statements contained within the fundraising emails in C.1.

3. Any changes to any of the fundraising emails in C.1.

4. All documents that support or contradict any of the statements made in any fundraising emails in C.1.

D. For the time period November 3, 2020 through January 20, 2021, all non-privileged internal communications at Iterable and/or involving Iterable's employees, agents, and/or representatives regarding:

1. All fundraising emails in C.1;

2. Any discussions about whether or not the emails in A.1 complied with Iterable's Policies, including, but not limited to, discussion of inflammatory language, violence and/or false and/or misleading information in those emails.

3. Any proposed changes to any of the fundraising emails in C.1.

E. Documents sufficient to show the copy or text of any fundraising emails that Iterable sent out on behalf of any of the Entities and Individuals.

F. Documents sufficient to show how much money was raised by any of the fundraising emails in A.1, and any communications related to how much money was raised by any of the fundraising emails in C.1.

G. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 23, 2023

VIA Electronic Mail

Silicon Valley Bridge Bank, N.A.
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230323-E0250

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to [redacted] at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Silicon Valley Bridge Bank, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230323-E0250

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230323-E0250 dated March 23, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Silicon Valley Bridge Bank, NA
Attn: Legal Department
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 through January 31, 2023 for the following:

1. Name: Gary Coby
   Social Security Number: [redacted]
   Date of Birth: [redacted]
2. Account Number: [redacted]
3. Account Number: [redacted]
4. Account Number: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank

account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form

of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 23, 2023

VIA Federal Express

Navy Federal Credit Union
[redacted]
Attn: Subpoena Department

Re: Grand Jury Subpoena #GJ20230323-E0251

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Navy Federal Credit Union
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230323-E0251

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230323-E0251 dated March 23, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Navy Federal Credit Union
Attn: Subpoena Department
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 to September 2022 for the following:

1. Name: Sean Dollman
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]
   Known Account: #[redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names

under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]

Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 23, 2023

VIA Facsimile

Bank of America, N.A.
[redacted]
Attn: Legal Order and Case Resolution Operations

Re: Grand Jury Subpoena #GJ20230323-E0252

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Bank of America, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 23, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230323-E0252

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230323-E0252 dated March 23, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Bank of America
[redacted]

Method of Service: Fax: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of October 2020 through September 30, 2022 for the following:

1. Name: Sean Dollman
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax

notifications

- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries,

affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

Joe Ascioti

Re: Grand Jury Subpoena #GJ20230317-E0237

Dear Mr. Ascioti:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Joe Ascioti

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230317-E0237

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230317-E0237

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

Jeff Aubin

Re: Grand Jury Subpoena #GJ20230317-E0231

Dear Mr. Aubin:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Jeff Aubin

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230317-E0231

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230317-E0231

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Joe Ascioti; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Julia Trent; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 20, 2023

Julia Trent

Re: Grand Jury Subpoena #GJ20230317-E0234

Dear Ms. Trent:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted] Please call me immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the

investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Julia Trent

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: March 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230317-E0234

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230317-E0234

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

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a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

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a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

G. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents related to any fundraising done by the Republican National Committee, Donald J. Trump for President, Inc. ("Trump Campaign"), the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee, including, but not limited to:

1. All fundraising emails that were sent out between November 3, 2020 and January 20, 2021, including, but not limited to all drafts and any documents or communications discussing any draft or final emails;
2. All documents relating to the drafting of any fundraising emails that were sent out between November 3, 2020 and January 20, 2021;
3. All documents that support or contradict any of the statements made in any fundraising emails sent out between November 3, 2020 and January 20, 2021;
4. All documents relating to any testing of the form and substance of the fundraising emails that was done with regard to any of the fundraising emails sent out between November 3, 2020 and January 20, 2021;
5. All documents relating to the decision to stop sending fundraising emails on January 6, 2021;
6. All documents related to, or part of, Trello;
7. All documents related to any fundraising goals between November 3, 2020 and January 20, 2021;
8. All documents related to budgeting and/or billing for the fundraising emails that were sent out between November 3, 2020 and January 20, 2021; and/or
9. All documents related to or referencing Salesforce, FP1 Strategies; WinRed, Harris Sikes Media; Opn Sesame; and/or Direct Persuasion.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021.

C. For the time period of November 3, 2020 through January 20, 2021, all communications between or among or referencing you and one or more of the following individuals or entities:

1. Benjamin Angle;
2. Rudy Giuliani;
3. Jason Miller;
4. Andrew Surabian;
5. Donald Trump, Jr.;
6. Eric Trump;
7. Lara Trump;

8. Any individual who was employed by the Republican National Committee between November 1, 2020 and January 20, 2021, including but not limited to, Hanna Allred; Joe Ascioti; Jeff Aubin; Austin Bodeigheimer; Alex Blinkoff; Cassie Docksey; Karla Howard; Ethan Katz; Jenna Kirsch; Ronna McDaniel; Alex Murglin; Ashley Grace Novak; Michael Reed; Justin Reimer; Richard Walters and/or Kevin Zambrano;

9. Any employee, contractor, or agent of Donald J. Trump for President, Inc., including but not limited to Alex Cannon; Darren Centinello; Justin Clark; Dan Cleary; Gary Coby; Sean Dollman; Jacki Kotkiewicz; Jared Kushner; Tim Murtaugh; Jason Miller; Zachary Parkinson; Bradley Parscale; William Stepien; Andrew Surabian; Matt Van Hyfte; and/or Matt Wolking;

10. Any individual who had an official or unofficial role in the White House between November 1, 2020 and January 20, 2021, including but not limited to Jared Kushner;

11. Any employee, contractor, or agent of Make America Great Again PAC, Trump Make America Great Again Committee; Save America and/or Save America JFC; and/or

12. Any employee, contractor, or agent of Salesforce, FP1 Strategies; WinRed, Harris Sikes Media, Opn Sesame; and/or Direct Persuasion.

D. For the time period of November 3, 2020 through January 20, 2021, all documents related to:

1. The use of Michael R. Pence's name in fundraising, including but not limited to whether his name could or would continue to be used in fundraising;

2. Any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails; and/or

3. All joint fundraising efforts involving the RNC, all documents related to any changes as to what entities would participate in any fundraising campaign and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. For the time period of November 3, 2020 through September 30, 2022, all documents related to or as resulting from any media inquiries, including any responses, any discussions about potential responses, and/or any discussions in an effort to determine a potential response, about how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

H. For the time period of November 3, 2020 through September 30, 2022, all documents related to how the money raised by TMAGAC between November 3, 2020 and January 20, 2021 was used, including the "Election Defense Fund" and any disclaimers about the use of money.

I. For the time period of November 3, 2020 through January 20, 2021, all documents relating to any media inquiries regarding any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

J. For the time period of November 3, 2020 through January 20, 2021, all documents related to any response, potential response, or discussion about whether and/or how the RNC and/or any of its representatives should or would respond to any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

K. For the time period of November 3, 2020 through January 20, 2021, all documents related to any disagreement, whether as to tone or substance or anything else, the RNC or any of its employees, agents, or contractors had with any statement made by or on behalf of Donald J. Trump, anyone affiliated with the Trump Campaign, anyone affiliated (formally or informally) with the White House, including, but not limited to statements made by Donald J. Trump, Eric Trump, Donald J. Trump, Jr., Lara Trump, Rudy Giuliani, Sidney Powell, and/or Jenna Ellis.

L. All documents related to or referencing January 6, 2021, the Rally, and/or the subsequent march to and breach of the United States Capitol.

M. All documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capital, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

N. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 15, 2023

Red Spark Strategy

Re: Grand Jury Subpoena #GJ20230314-E0219

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Red Spark Strategy

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, March 28, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 15, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230314-E0219

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230314-E0219 dated March 15, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. All agreements, draft or final, between Red Spark Strategy and one or more of the following entities:

1. Save America;
2. Save America Joint Fundraising Committee;
3. Trump Make America Great Again Committee;
4. Make America Great Again PAC; and/or
5. Donald J. Trump for President, Inc.

B. Documents sufficient to show all employees, including agents and independent contractors, of Red Spark Strategy between October 1, 2020 and September 30, 2022.

C. Documents sufficient to show any vendor and/or subcontractor who completed work for or on behalf of Red Spark Strategy between October 1, 2020 and September 30, 2022 to the extent that work was, in whole or part, done for, charged to, and/or paid for by, one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, or any employee, agent, or independent contractor of one of those entities.

D. Documents sufficient to show all individuals and/or entities who have been paid, directly or indirectly, by Red Spark Strategy between October 1, 2020 and September 30, 2022.

E. For the period from October 1, 2020 to September 30, 2022, all payroll records, including records disclosing the dates of payroll services, wages or commissions paid, checks (front and back) used for any payments to or on behalf of the above individual and entities. Employees Withholding Exemption Certificate (Form W-4); Wage and Tax Statements (Forms W-2) disclosing employee annual wages; U.S. Information Returns (Forms l 099) disclosing fees, commissions, etc. paid.

F. Documents sufficient to show how much money Red Spark Strategy received from one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee between October 1, 2020 and September 30, 2022.

G. All Corporate Bookkeeping records and other financial records including General Ledger, General Journals, all Subsidiary Ledgers and Journals, Gross Receipts and income records, Cash Receipts and Disbursement records and/or Journals, sales and Purchase records and/or Journals, Accounts Receivable and Payable Ledgers and records, Bad Debt records, Cost of Goods and or Services Sold records, Loan Receivable and Payable Ledgers, Voucher Register and all sales and expense invoices including all invoices documenting expenses paid by cash (currency) or bank check (cashier or teller checks) and retained copies of any bank checks (cashier or teller checks.)

H. Federal and state tax returns filed by Red Spark Strategy for tax years 2020 and 2021.

I. For the period from October 1, 2020 to September 30, 2022, all documents and communications relating to one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee, including, but not limited to:

1. Documents and communications related to the formation, funding, and/or use of money received by one or more of Save America, the Save America Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

2. Documents and communications related to work to be done and/or done on behalf of, one or more of Save America, the Save Joint Fundraising PAC, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

3. Documents and communications related to bills to be paid and/or paid, either directly or indirectly, by one or more of Save America, the Save America Joint Fundraising Committee, the Make America Great Again PAC, and/or the Trump Make America Great Again Committee.

J. Documents sufficient to show work performed by Red Spark Strategy for one or more of the Trump Make America Great Again Committee, Make America Great Again PAC, Donald J. Trump for President, Inc., Save America, and/or the Save America Joint Fundraising Committee.

K. To the extent any attorney or law firm is being paid directly or indirectly to represent Red Spark Strategy by anyone other than Red Spark Strategy, copies of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 24, 2023

VIA Electronic Mail

Save America Joint Fundraising Committee

Re: Grand Jury Subpoena #GJ20230324-E0262

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Save America Joint Fundraising Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 24, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230324-E0262

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230324-E0262 dated March 24, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. Documents sufficient to show all former employees, contractors, agents and/or representatives of the Trump Administration and/or Donald J. Trump for President and current and/or former employees, contractors, agents and/or representatives of Save America, Make America Great Again PAC, Trump Make America Great Again Committee, Save America Joint Fundraising Committee, Mar-A-Lago LLC, and/or the 45 Office who are or who have had any legal bills paid by one or more of Save America, Make America Great Again PAC, Trump Make America Great Again Committee and/or Save America Joint Fundraising Committee since January 6, 2021.

B. All agreements, entered into since January 6, 2021, draft or final, between Save America, Save America Joint Fundraising Committee, Make America Great Again PAC, Trump Make America Great Again Committee, and/or Donald J. Trump for President, on the one hand, and any individual, entity, firm, or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity other than Donald J. Trump, whether directly or through another entity, including, but not limited to, all agreements that involve the payment of fees to the following entities for the representation of anyone other than Donald J. Trump:

1. Abel Bean Law P.A.
2. Akin Gump Strauss Hauer & Feld
3. Bedell, Dittmar, DeVault, Pillans
4. Brand Woodward Law
5. Cadwalader, Wickersham & Taft
6. Clark Hill PLC
7. Compass Legal Group
8. Compass Legal Services, Inc
9. Dhillon Law Group Inc
10. Earth & Water Law LLC
11. Elections, LLC
12. Greenberg Traurig
13. Jones Day
14. JPRowley Law PLLC
15. Kasowitz, Benson, Torress LLP
16. Marino, Tortorella & Boyle, P.C.
17. McGuireWoods LLP
18. Mintz Levin Cohn Ferris Glovsk
19. Neal & Harwell, PLC
20. Nelson Mullins Riley & Scarborough
21. Parlatore Law Group, LLP
22. Squire Patton Boggs (US) LLP
23. Statecraft PLLC
24. The Binnall Law Group

25. The Garber Group LLC

C. Documents sufficient to show all retainer payments and/or other payments made to any attorney and/or law firm to represent any of the individuals in Topic B since January 6, 2021.

D. Documents sufficient to show everyone involved in the approval of any engagement of and/or payments or potential payments made to any attorney and/or law firm of the individuals in Topic B since January 6, 2021.

E. Copies of all joint defense agreements that involve one or more of the individuals in Topic B that were entered into since January 6, 2021.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 24, 2023

VIA Electronic Mail

Save America

Re: Grand Jury Subpoena #GJ20230324-E0263

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Save America

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 24, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230324-E0263

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230324-E0263 dated March 24, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period, November 3, 2020 to present, all documents to/from/cc/bcc the email address [redacted]@saveamerica45.[redacted] and any other Accounts Payable listserve utilized by Save America since November 3, 2020.

B. Documents sufficient to show all former employees, contractors, agents and/or representatives of the Trump Administration and/or Donald J. Trump for President and current and/or former employees, contractors, agents and/or representatives of Save America, Make America Great Again PAC, Trump Make America Great Again Committee, Save America Joint Fundraising Committee, Mar-A-Lago LLC, and/or the 45 Office who are or who have had any legal bills paid by one or more of Save America, Make America Great Again PAC, Trump Make America Great Again Committee and/or Save America Joint Fundraising Committee since January 6, 2021.

C. All agreements, entered into since January 6, 2021, draft or final, between Save America, Save America Joint Fundraising Committee, Make America Great Again PAC, Trump Make America Great Again Committee, and/or Donald J. Trump for President, on the one hand, and any individual, entity, firm, or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity other than Donald J. Trump, whether directly or through another entity, including, but not limited to, all agreements that involve the payment of fees to the following entities for the representation of anyone other than Donald J. Trump:

1. Abel Bean Law P.A.
2. Akin Gump Strauss Hauer & Feld
3. Bedell, Dittmar, DeVault, Pillans
4. Brand Woodward Law
5. Cadwalader, Wickersham & Taft
6. Clark Hill PLC
7. Compass Legal Group
8. Compass Legal Services, Inc
9. Dhillon Law Group Inc
10. Earth & Water Law LLC
11. Elections, LLC
12. Greenberg Traurig
13. Jones Day
14. JPRowley Law PLLC
15. Kasowitz, Benson, Torress LLP
16. Marino, Tortorella & Boyle, P.C.
17. McGuireWoods LLP
18. Mintz Levin Cohn Ferris Glovsk
19. Neal & Harwell, PLC
20. Nelson Mullins Riley & Scarborough

21. Parlatore Law Group, LLP
22. Squire Patton Boggs (US) LLP
23. Statecraft PLLC
24. The Binnall Law Group
25. The Garber Group LLC

D. Documents sufficient to show all retainer payments and/or other payments made to any attorney and/or law firm to represent any of the individuals in Topic B since January 6, 2021.

E. Documents sufficient to show everyone involved in the approval of any engagement of and/or payments or potential payments made to any attorney and/or law firm of the individuals in Topic B since January 6, 2021.

F. Copies of all joint defense agreements that involve one or more of the individuals in Topic B that were entered into since January 6, 2021.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 24, 2023

VIA Electronic Mail

Make America Great Again PAC

Re: Grand Jury Subpoena #GJ20230324-E0264

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Make America Great Again PAC

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 24, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230324-E0264

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230324-E0264 dated March 24, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. Documents sufficient to show all former employees, contractors, agents and/or representatives of the Trump Administration and/or Donald J. Trump for President and current and/or former employees, contractors, agents and/or representatives of Save America, Make America Great Again PAC, Trump Make America Great Again Committee, Save America Joint Fundraising Committee, Mar-A-Lago LLC, and/or the 45 Office who are or who have had any legal bills paid by one or more of Save America, Make America Great Again PAC, Trump Make America Great Again Committee and/or Save America Joint Fundraising Committee since January 6, 2021.

B. All agreements, entered into since January 6, 2021, draft or final, between Save America, Save America Joint Fundraising Committee, Make America Great Again PAC, Trump Make America Great Again Committee, and/or Donald J. Trump for President, on the one hand, and any individual, entity, firm, or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity other than Donald J. Trump, whether directly or through another entity, including, but not limited to, all agreements that involve the payment of fees to the following entities for the representation of anyone other than Donald J. Trump:

1. Abel Bean Law P.A.
2. Akin Gump Strauss Hauer & Feld
3. Bedell, Dittmar, DeVault, Pillans
4. Brand Woodward Law
5. Cadwalader, Wickersham & Taft
6. Clark Hill PLC
7. Compass Legal Group
8. Compass Legal Services, Inc
9. Dhillon Law Group Inc
10. Earth & Water Law LLC
11. Elections, LLC
12. Greenberg Traurig
13. Jones Day
14. JPRowley Law PLLC
15. Kasowitz, Benson, Torress LLP
16. Marino, Tortorella & Boyle, P.C.
17. McGuireWoods LLP
18. Mintz Levin Cohn Ferris Glovsk
19. Neal & Harwell, PLC
20. Nelson Mullins Riley & Scarborough
21. Parlatore Law Group, LLP
22. Squire Patton Boggs (US) LLP
23. Statecraft PLLC
24. The Binnall Law Group

25. The Garber Group LLC

C. Documents sufficient to show all retainer payments and/or other payments made to any attorney and/or law firm to represent any of the individuals in Topic B since January 6, 2021.

D. Documents sufficient to show everyone involved in the approval of any engagement of and/or payments or potential payments made to any attorney and/or law firm of the individuals in Topic B since January 6, 2021.

E. Copies of all joint defense agreements that involve one or more of the individuals in Topic B that were entered into since January 6, 2021.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

March 24, 2023

VIA Electronic Mail

Trump Make America Great Again Committee

Re: Grand Jury Subpoena #GJ20230324-E0265

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law. Thank you for your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Trump Make America Great Again Committee

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 6, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: March 24, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230324-E0265

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230324-E0265 dated March 24, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements;

bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. Documents sufficient to show all former employees, contractors, agents and/or representatives of the Trump Administration and/or Donald J. Trump for President and current and/or former employees, contractors, agents and/or representatives of Save America, Make America Great Again PAC, Trump Make America Great Again Committee, Save America Joint Fundraising Committee, Mar-A-Lago LLC, and/or the 45 Office who are or who have had any legal bills paid by one or more of Save America, Make America Great Again PAC, Trump Make America Great Again Committee and/or Save America Joint Fundraising Committee since January 6, 2021.

B. All agreements, entered into since January 6, 2021, draft or final, between Save America, Save America Joint Fundraising Committee, Make America Great Again PAC, Trump Make America Great Again Committee, and/or Donald J. Trump for President, on the one hand, and any individual, entity, firm, or attorney, on the other hand, regarding the representation of and/or payment of legal fees for any individual or entity other than Donald J. Trump, whether directly or through another entity, including, but not limited to, all agreements that involve the payment of fees to the following entities for the representation of anyone other than Donald J. Trump:

1. Abel Bean Law P.A.
2. Akin Gump Strauss Hauer & Feld
3. Bedell, Dittmar, DeVault, Pillans
4. Brand Woodward Law
5. Cadwalader, Wickersham & Taft
6. Clark Hill PLC
7. Compass Legal Group
8. Compass Legal Services, Inc
9. Dhillon Law Group Inc
10. Earth & Water Law LLC
11. Elections, LLC
12. Greenberg Traurig
13. Jones Day
14. JPRowley Law PLLC
15. Kasowitz, Benson, Torress LLP
16. Marino, Tortorella & Boyle, P.C.
17. McGuireWoods LLP
18. Mintz Levin Cohn Ferris Glovsk
19. Neal & Harwell, PLC
20. Nelson Mullins Riley & Scarborough
21. Parlatore Law Group, LLP
22. Squire Patton Boggs (US) LLP
23. Statecraft PLLC
24. The Binnall Law Group

25. The Garber Group LLC

C. Documents sufficient to show all retainer payments and/or other payments made to any attorney and/or law firm to represent any of the individuals in Topic B since January 6, 2021.

D. Documents sufficient to show everyone involved in the approval of any engagement of and/or payments or potential payments made to any attorney and/or law firm of the individuals in Topic B since January 6, 2021.

E. Copies of all joint defense agreements that involve one or more of the individuals in Topic B that were entered into since January 6, 2021.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
[redacted]
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 4, 2023

Matthew Wolking

Re: Grand Jury Subpoena #GJ20230403-E0277

Dear Mr. Wolking:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding.

You have the right to speak to an attorney prior to appearing before the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. If you cannot afford to hire an attorney and would like to speak to one, please contact [redacted] or [redacted] at the Federal Public Defender Service for the District of Columbia at [redacted]. If you qualify for a court appointed attorney, the Federal Public Defender Service will attempt to arrange to have an attorney appointed for you. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the Department of Justice to arrange your travel and accommodations, please contact us at [redacted]. Please email immediately if there are any scheduling problems. Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being

conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Matthew Wolking

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 13, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. **This subpoena also requires your testimony before the grand jury at a later date**. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant Special Counsel to schedule the date you will appear for testimony in the grand jury.

Date: April 4, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230403-E0277

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ20230403-E0277

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders;

receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the time period of November 3, 2020 through January 20, 2021, all documents and communications related to any fundraising done by the Donald J. Trump for President, Inc. ("Trump Campaign"), the Republican National Committee, the Trump Make American Great Again Committee, the Make America Great Again PAC, Save America, and/or Save American Joint Fundraising Committee.

B. Regardless of time period, all documents related to the "Election Defense Fund" or "Official Election Defense Fund" referenced in the fundraising emails sent out between November 3, 2020 and January 20, 2021; including how money for the "Election Defense Fund" was raised, how money for the "Election Defense Fund" was spent, and disclaimers/disclosures relating to the "Election Defense Fund."

C. For the time period of November 3, 2020 through January 20, 2021, all documents and communications related any individual indicating that they do not want to be, or no longer would be, a surrogate in fundraising emails, including any documents or communications related to removing anyone's name from fundraising emails.

D. For the time period of November 3, 2020 through January 20, 2021, all documents and communications related to any changes as to what entities would participate in any fundraising campaign involving one or more of the entities identified in III.A and/or how the funds raised would be divided among participating entities.

E. All documents related to American Made Media Consultants.

F. All documents and communications related to any television ads to be aired between November 3, 2020 and January 20, 2021 related to the 2020 Presidential election and/or certification of the 2020 Presidential election and/or any issue related thereto, including, but not limited to "Overwhelming," "Stop the Steal," and "On Tape," including, but not limited to, any documents related to budgeting for, payment for, content for, and/or any evidence supporting, contradicting, or related to the information contained in any such ads.

G. To the extent any attorney or law firm is being paid directly or indirectly to represent you by anyone other than you, a copy of the retention agreement.

PLEASE PROVIDE THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigation
Washington Field Office
601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 7, 2023

VIA Hand Delivery

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230406-E0290

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 13, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230406-E0290

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230406-E0290	4/6/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Chain Bridge Bank

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Maria K. Vento
[redacted]

6 Return Date: 4/13/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento

9 Email: [redacted]

10 Date of request: 4/7/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230406-E0290 dated April 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: In Person

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of November 2020 to the Present for the following:

1. Entity Name: Any and all iterations of Make America Great Again and related entities.
2. Known account ending in [redacted]
3. Known account ending in [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g.

the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 7, 2023

VIA Hand Delivery

Chain Bridge Bank
[redacted]

Re: Grand Jury Subpoena #GJ20230406-E0291

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Chain Bridge Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 20, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230406-E0291

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230406-E0291	4/6/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Chain Bridge Bank

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Maria K. Vento
[redacted]

6 Return Date: 4/20/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Maria K. Vento

9 Email: [redacted]

10 Date of request: 4/7/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230406-E0291 dated April 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Chain Bridge Bank
[redacted]

Method of Service: In Person

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the Present for the following:

1. Individuals:
    a. Name: Justin Clark
    Social Security Number [redacted]
    Date of Birth: [redacted]
    Associated Addresses: [redacted]

2. Known Account: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos

    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

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CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]

Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 7, 2023

VIA Portal

Capital One, N.A.
[redacted]
Attn: [redacted] (Subpoena Department)

Re: Grand Jury Subpoena #GJ20230406-E0292

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Capital One, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 20, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 7, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230406-E0292

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230406-E0292	4/6/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

Capital One, N.A.

5 Deliver To: Maria K. Vento
[redacted]

6 Return Date: 4/20/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Maria K. Vento	[redacted]	4/7/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230406-E0292 dated April 7, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Capital One, N.A.
Attn: [redacted] (Subpoena Dept)
[redacted]

Method of Service: Portal: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 to the Present for the following:

1. Individuals:
    a. Name: Justin Clark
    Social Security Number [redacted]
    Date of Birth: [redacted]
    Associated Addresses: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos

    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW, Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor [redacted]

Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachel Bingham, [redacted]
Forensic Accountant Showlatha Johnson, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 11, 2023

VIA Electronic Mail

Flagstar Bank, N.A.
[redacted]
Attn: Subpoena Compliance

Re: Grand Jury Subpoena #GJ20230410-E0296

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*_____
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Flagstar Bank, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Tuesday, April 25, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 11, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230410-E0296

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230410-E0296	4/11/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Flagstar Bank, N.A.

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 4/25/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	4/11/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230410-E0296 dated April 11, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Flagstar Bank, N.A.
RE: Signature Bank Accounts
Attn: Subpoena Compliance
[redacted]

Method of Service: Email to [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

Signature Bank accounts:

1. Rudolph Giuliani
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. Rudolph W Giuliani PLLC
   EIN: [redacted]
   Known Account [redacted]

3. Giuliani Partners LLC
   EIN: [redacted]
   Known Account: [redacted]

4. Giuliani Security & Safety LLC
   EIN: [redacted]
   Known Accounts: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
    - Negotiated / canceled checks (front and back)
    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 14, 2023

VIA Electronic Mail

Apple, Inc.
[redacted]
Attn: Privacy and Law Enforcement Compliance

Re: Grand Jury Subpoena #GJ20230413-E0297

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice, it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Electronic Communications Privacy Act, 18 U.S.C. § 2701 et seq., electronic communications services providers responding to a grand jury subpoena for production of certain records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may not be made for records or other information relating to telephone toll records and listings described in 18 U.S.C. § 2703(c)(2). Please note that under the Act, the Department of Justice will not reimburse expenses incurred for the production of information kept in the ordinary course of business. An exception can be made if compliance with a grand jury subpoena requires the expenditure of unusual effort or resources. In that circumstance, reimbursement of the "reasonable cost" of such services can be made if the government and subpoena recipient mutually agree on the amount, or if the court orders reimbursement.

If you believe that you are entitled to reimbursement, please send a full and complete itemized statement for all costs in an invoice that makes clear the basis for the reimbursement request.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED SCO-212 FORM, AND (3) A COPY OF THE SUBPOENA.

Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. **Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.**

Enclosed please find a nondisclosure order from the court directing Apple Inc. not to notify any person (including the subscriber or customer) of the existence or content of this subpoena. You are directed not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure on your part could impede the investigation being conducted and thereby interfere with the enforcement of the law. We appreciate your cooperation in this matter.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE APPLICATION OF USA FOR 2705(b) NONDISCLOSURE ORDER FOR GRAND JURY SUBPOENA #GJ20230413-E0297	Case No. 23-sc- 677 **Filed Under Seal**

ORDER

This matter having come before the Court pursuant to an application under 18 U.S.C. § 2705(b) requesting an order directing Apple, Inc. ("PROVIDER"), an electronic communication and/or remote computing service provider located in Cupertino, CA, not to notify any other person of the existence of subpoena number **GJ20230413-E0297** issued by the United States on behalf of a federal Grand Jury empaneled in the United States District Court for the District of Columbia (the "Subpoena"), the Court finds reasonable grounds to believe that such disclosure will result in destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation. *See* 18 U.S.C. § 2705(b)(3)-(5).

IT IS THEREFORE ORDERED that, pursuant to 18 U.S.C. § 2705(b), PROVIDER and its employees shall not disclose the existence of the Subpoena to any other person (except attorneys for PROVIDER for the purpose of receiving legal advice) for a period of one year (commencing on the date of this Order), unless the period of nondisclosure is later modified by the Court.

IT IS FURTHER ORDERED that the application and this Order are sealed until otherwise ordered by the Court.

SO ORDERED.

Date: 4/13/23

JAMES E. BOASBERG
CHIEF JUDGE

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Apple, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, April 27, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 14, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Senior Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230413-E0297

U.S. Department of Justice
Washington, D.C. 20530

Request for Communications Content, Records or Other Information Under the Electronic Communications Privacy Act (ECPA). (Authorization, Purchase Order and Receiving Report)

This form shall be used when requesting communications content, records, or other information from electronic communications or remote computing service providers under the ECPA.

1 Tracking Number:	2 Date Order Prepared:	3 SCO Reference Number:
GJ20230413-E0297		**N/A**

Section A – Authorization and Purchase Order

4 Name and Address of Service Provider:
Apple, Inc.
[redacted]

Funding Certification & Authorization:

A. _____
Budget Official Signature Funding Available Date

B. _____
Approving Official Signature Date

5 Deliver Records To:
Maria K. Vento
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530

Send Completed SCO-212 Form & Invoice To:
[redacted]

6 Return Date:

7 Remarks: Do not proceed with compliance if the total cost will exceed without prior approval. To obtain approval, call the requestor listed in Item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment. Please see the attached Important Notice for additional information on invoicing and other requirements for reimbursement.

8 Name of Requestor:	9 Telephone Number:	10 Date of request:

Section B - ECPA Service Provider Invoice

11A Invoice Number: / 11B Tax ID Number:		Quantity	Unit Price Cost	Unit Price Per	Amount
11C Service(s)/Records Provided:					

The costs above (or on the attached invoice) represent direct costs and have been incurred in searching for, assembling, reproducing or otherwise providing the requested information.

12 Signature of Service Provider Representative:	13 Date Signed:	Total Amount Claimed By Service Provider	
Section C - Receiving Report		16 Disallowance *(See Attached)*	
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Service Provider	

18 Electronic Communications Privacy Act - Public Law 99-508
(18 U.S.C. 2701-2712) Request Pursuant To: *(Only One Section at Left Should Be Checked)*

SECTION		OBJECT CLASS
☐ 2702	Voluntary Disclosure	2570
☒ 2703	Compelled Disclosure	2570
	☐ Search Warrant	2570
	☒ Grand Jury Subpoena	2570
	☐ Court Order	2570
	☐ Administrative or Judicial Subpoena	2570
☐ 2704	Request for Information Following Preservation	2570

22 Remarks:

19 Signature of Approving Official: Date:

20 Funding Source

Accounting Code:

Program

21 Other Accounting/Fund Information:
Program Code: Project Code:
YREGDOC:
Call Number (if applicable):
OBL Month (YRMO):
Tax ID Number:

The costs above (or on the attached invoice) appear to be reasonably necessary and to have been directly incurred in searching for, assembling, reproducing or otherwise providing requested information

Signature of Department of Justice Representative Date

FORM SCO-212
EEB. 2014

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230413-E0297 dated April 14, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit

ATTACHMENT

Issued to: Apple Inc.
Attn: Privacy and Law Enforcement Compliance
[redacted]

Method of Service: [redacted]

The following records associated with the song "Justice for All" recorded by Donald J. Trump and the J6 Prison Choir, **excluding** information associated with individuals who purchased the song through any Apple application. Records that should be produced include the following:

1. Royalty Agreements, iTunes Connect Online Applications, Contracts, and/or any other written agreements with any third parties associated with the listed song/artists.
2. All available identifying information for entities/individuals associated with the listed song/artists, including Apple ID, name, phone number, email address, date of birth, social security number/EIN, and address.
3. A summary of revenue and/or royalties generated by purchases of the song through any Apple music service, including iTunes and Apple Music, including the total revenue/royalties generated and a weekly breakdown of the revenue/royalties generated.
4. A schedule of royalty payments made to any individuals/companies related to the listed song/artists.
5. Details relating to the method of royalty payments, including copies of wire receipts, ACH receipts, checks, and/or any other payment records.
6. Details relating to any associated financial account information for the recipient(s) of any royalties, including account names, account numbers, routing numbers, and the names of the corresponding financial institutions.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1)

produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]

INSTRUCTIONS FOR PRODUCTION OF RECORDS

I. General:

a. Records existing as **Electronically Stored Information (ESI)** shall be produced in **non-proprietary electronic form** and shall include text data and image data held:
   i. In your record retention systems; and/or
   ii. By your technology, data, or other service provider(s).

b. Records that do not exist as ESI may be produced in paper or other original format and may be converted to image or text data and provided as ESI, unless originals are required.

II. Text Data

a. Text data relating to transactions shall be produced within a data file:
   i. Using a delimited ASCII text data format; or
   ii. Using software that can export to a commonly readable, non-proprietary file format without loss of data.

b. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

III. Image Data

a. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.

b. Image data of items associated with transactions (e.g., checks and deposit slips) shall be:
   i. Produced in individual graphic data files with any associated endorsements; and
   ii. Linked to corresponding text data by a unique identifier.

IV. Encryption/Authentication

a. ESI may be transmitted in an encrypted container *(e.g. flash drive, CD/DVD)*. Decryption keys and/or passwords shall be produced separately at the time the data are produced. *Please do <u>not</u> encrypt individual file contents if the container is encrypted.*

b. Authentication, such as hash coding, may be set by agreement.

c. Affidavits or certificates of authenticity may be included as part of the electronic production.

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 20, 2023

VIA Portal

Coinbase, Inc.
[redacted]
Attn: Law Enforcement Requests

Re: Grand Jury Subpoena #GJ20230419-E0308

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA, and (3) A COMPLETED OBD-211 FORM.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*_____
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Coinbase, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230419-E0308

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230419-E0308	4/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Coinbase, Inc.

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 5/4/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	4/20/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230419-E0308 dated April 20, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Coinbase, Inc.
Attn: Law Enforcement Requests
[redacted]

Method of Service: Upload subpoena to [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]

These records should include, at a minimum, current balances and the following:

ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents, paperwork identifying any person or entity which has held power of attorney or signatory authority on the account(s)
- Customer Due Diligence, Know Your Customer (KYC), and Beneficial Ownership records
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s)

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

TRANSACTIONS: Records that disclose the date and amount of transactions, method (cash, check, or electronic transfer) and source of payment. Source and destination data for funds transfer transactions (including on-line banking transactions), to include the full account number and account holder. All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders. All documents pertaining to wire transfers sent or received by any of the named parties or entities.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor

Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr [redacted]
Forensic Accountant Rachael Bingham [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 20, 2023

VIA Electronic Mail

Early Warning Services LLC
[redacted]
Attn: Subpoena Processing

Re: Grand Jury Subpoena #GJ20230419-E0309

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA, and (3) A COMPLETED OBD-211 FORM.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*_____
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Early Warning Services LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230419-E0309

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230419-E0309	4/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Early Warning Services LLC

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 5/4/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	4/20/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230419-E0309 dated April 20, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Early Warning Services LLC
Attn: Subpoena Processing
[redacted]

Method of Service: Email to [redacted]

Please provide copies of all records and processed transactions relating or referring to the following businesses and/or individuals, for the **period of September 1, 2020 to December 31, 2021.**

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Possible Bank Accounts: [redacted]
   Possible Zelle Transfer Confirmation: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Phone: [redacted]
   Email: [redacted]
   Email: [redacted]
   Email: [redacted]
   Possible Bank Accounts: [redacted]

Possible Zelle Transfer Confirmation: [redacted]

Your responses should include, but not be limited to, the following documents and data:

1. Any and all account information retained;
2. Summary Consumer Disclosure Report and any record of inquiries from financial institutions;
3. Contact information;
4. Transaction history to include:
   a. Recipient/Sender name, email, and phone number
   b. Recipient/Sender payment profile ID and status
   c. Recipient/Sender token ID and status
   d. Recipient/Sender bank name and bank account number
   e. Transaction date and amount
   f. Payment Status
   g. Zelle transaction ID
5. Account notes

Follow-up requests for underlying information related to these records, will be deemed as requested under this subpoena.

Please provide responsive materials in native, **electronic format**, if possible.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its

possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 20, 2023

VIA Electronic Mail

Fidelity Investments
[redacted]
Attn: Legal Operations

Re: Grand Jury Subpoena #GJ20230419-E0310

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA, and (3) A COMPLETED OBD-211 FORM.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*_____
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Fidelity Investments
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230419-E0310

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230419-E0310	4/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Fidelity Investments

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 5/4/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Erin B. Pulice

9 Email: [redacted]

10 Date of request: 4/20/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230419-E0310 dated April 20, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Fidelity Investments
Attn: Legal Operations
[redacted]

Method of Service: Email to [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

2. John Eastman
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:

  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account

number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

May 8, 2023

VIA Electronic Mail

PNC Bank/BBVA USA dba BBVA Compass Bank
[redacted]
Attn: Legal Department

Re: Grand Jury Subpoena #GJ20230504-E0333

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORMS and (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to our budget officer at [redacted].

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: PNC Bank/BBVA USA dba BBVA Compass Bank
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 18, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: May 8, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230504-E0333

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230504-E0333 dated May 8, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on ____. _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230504-E0333	5/8/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

PNC Bank/BBVA USA

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Maria K. Vento
[redacted]

6 Return Date: 5/18/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Maria K. Vento	[redacted]	5/8/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

ATTACHMENT

Issued to: **PNC Bank/BBVA USA dba BBVA Compass Bank**
[redacted]

Method of Service: Email: [redacted]

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 2020 – October 2022 for the following:

1. Entity Name: 2M Document Management & Imaging, LLC
   Known Address: [redacted]
   Known Acct: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications

- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.
LOAN RECORDS: All documents pertaining to open or closed bank loans, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and

representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTRONIC FORMAT TO:

Special Agent Jeremy Desor and Walter B. Giardina
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR15 601 4th Street NW,
Washington, DC, 20535
Email addresses: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Walter B. Giardina, [redacted]
Special Agent Jeremy Desor, [redacted]
Forensic Accountant Brian Marchelewski, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

May 11, 2023

VIA Federal Express

JP Morgan Chase
[redacted]

Re: Grand Jury Subpoena #GJ20230510-E0338

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant United States Attorney at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Maria K. Vento*_____
Maria K. Vento
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 18, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: May 11, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Maria K. Vento, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230510-E0338

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230510-E0338 dated May 11, 2023, signed by Assistant Special Counsel Maria K. Vento, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230510-E0338	5/10/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

JP Morgan Chase Bank, N.A.

5 Deliver To: Maria K. Vento
[redacted]

6 Return Date: 5/18/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Maria K. Vento	[redacted]	5/11/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

ATTACHMENT

Issued to: JPMorgan Chase Bank, N.A.
Attn: National Subpoena Processing
[redacted]

Method of Service: Fed-Ex

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

1. Robert R Gasaway
   DOB: [redacted]
   SSN: [redacted]
   Possible Account: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

All correspondence with the individual(s) involved in the outgoing wire transaction listed below. To include but not be limited to written correspondence, audio recording, video recording, still photos, etc.

Date	Description	Amount
[redacted]		

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)

    - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
    - Deposit slips, items deposited
    - Wire transfers, EFT / ACH payment support, electronic payments
    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor

Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

May 19, 2023

VIA Federal Express

JP Morgan Securities, LLC
[redacted]
Attn: National Subpoena Processing Center

Re: Grand Jury Subpoena #GJ20230519-E0351

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS, or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to Karen Drolet at KYD@usdoj.gov.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Securities, LLC
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, June 1, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: May 19, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230519-E0351

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230519-E0351	5/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

JP Morgan Securities, LLC

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 6/1/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	5/19/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230519-E0351 dated May 19, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JPMorgan Securities, LLC
Attn: National Subpoena Processing
[redacted]

Method of Service: Fed-Ex

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

1. Robert R Gasaway
   DOB: [redacted]
   SSN: [redacted]
   Possible Account: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS/BROKERAGE ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties

    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

May 19, 2023

VIA Federal Express

JP Morgan Chase
[redacted]
Attn: National Subpoena Processing Center

Re: Grand Jury Subpoena #GJ20230519-E0352

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS, or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to Karen Drolet at KYD@usdoj.gov.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: JP Morgan Chase
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury [redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, June 1, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: May 19, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230519-E0352

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230519-E0352	5/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

JP Morgan Chase

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 6/1/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*) Erin B. Pulice

9 Email: [redacted]

10 Date of request: 5/19/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230519-E0352 dated May 19, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: JP Morgan Chase
National Subpoena Processing Center
[redacted]

Method of Service: FedEx

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to October 31, 2022 for the following individuals:

1. Name: Sean Dollman
   Social Security Number: [redacted]
   Date of Birth: [redacted]
   Associated Addresses: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
  - Credit and debit memos
  - All closing withdrawal documents

- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS: All statements, payment details, and documents pertaining to open or closed credit card accounts. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

MORTGAGE/AUTO/OTHER LOANS: All documents pertaining to any loans, including loan applications and supporting documents, contracts, loan agreements, account statements, and payment details. Payment details should include, but not be limited to, payment dates/amounts, copies of payment checks, and the name of the banks, accountholders and account numbers for all accounts from which ACH/wire/debit payments were made.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced

onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13

601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

June 1, 2023

VIA Federal Express

The Vanguard Group, Inc.
[redacted]
Attn: Office of the General Counsel

Re: Grand Jury Subpoena #GJ20230601-E0371

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS, or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COMPLETED OBD-211 FORM, AND (3) A COPY OF THE SUBPOENA.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to Karen Drolet at KYD@usdoj.gov.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: The Vanguard Group, Inc.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, June 15, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: June 1, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230601-E0371

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230601-E0371	6/1/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

The Vanguard Group, Inc.

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date:
6/15/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	6/1/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230601-E0371 dated June 1, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: The Vanguard Group, Inc.
Attn: Office of the General Counsel
[redacted]

Method of Service: Fed-Ex

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of December 1, 2020 to February 28, 2021 for the following:

1. Robert R Gasaway
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

Transaction on 1/28/2021 provided below for assistance in locating Vanguard account(s):

[redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS/INVESTMENT ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments

    - Support for bank transfers from other accounts including full bank account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing,

magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1) produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW

Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

November 28, 2022

VIA hand delivery

Robert Gasaway
[redacted]

Re: Grand Jury Subpoena #GJ2022112897075
USAO #2022R00150

Dear Robert Gasaway:

Enclosed is a subpoena commanding you to produce documents and appear as a witness before a federal Grand Jury. The Grand Jury consists of sixteen to twenty-three persons from the District of Columbia and is responsible for inquiring into federal crimes that may have been committed in this District.

The Grand Jury is conducting an investigation of possible violations of federal criminal laws. As a Grand Jury witness, you will be asked to testify. Upon receipt of this letter, please contact this office to obtain instructions on the logistics of coming to court, reimbursement for travel costs, and collecting a witness fee.

Only the members of the Grand Jury, attorneys for the United States, and a court reporter are permitted in the Grand Jury room while you testify. You may refuse to answer any question if a truthful answer to that question would tend to incriminate you. Anything that you do or say may be used against you by the Grand Jury or in another legal proceeding. You have the right to speak to an attorney before appearing in front of the Grand Jury. If you cannot afford an attorney, the Court may agree to appoint one for you free of charge. Your attorney cannot be in the Grand Jury room with you, but the Grand Jury will permit you a reasonable opportunity to step outside the Grand Jury room and confer with your attorney if you desire.

If you need the United States Attorney's Office to arrange your travel and accommodations, please call our Witness Coordinator, [redacted], at [redacted]. Please call me immediately if there are any scheduling problems.

Although you are not required to do so, you are requested not to disclose the existence of this subpoena or the fact of your compliance. Any such disclosure could impede the investigation being conducted and thereby interfere with the enforcement of the law.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

Jack Smith
Special Counsel

By: */s/ Timothy A. Duree*
Timothy A. Duree
Special Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Robert Gasaway
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Friday, December 16, 2022 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

This federal grand jury subpoena requires you to produce the materials identified in the attachment on the return date identified above. You may comply with the document production portion of this subpoena by promptly providing the required materials to the agent identified in the attachment. This subpoena also requires your testimony before the grand jury at a later date. Please contact, or have your attorney contact, the agent identified in the attachment or the undersigned Assistant United States Attorney to schedule the date you will appear for testimony in the grand jury.

Date: November 28, 2022

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant United States Attorney, who requests this subpoena, are:

Timothy A. Duree, Special Assistant United States Attorney
601 D Street N.W.
Washington, DC 20530
Phone: Fax:
Email: [redacted]

Subpoena #GJ2022112897075
USAO #2022R00150
Preparer: [redacted]

CO 293 (Rev. 8/91) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		
SERVED BY (PRINT NAME)		TITLE

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____
Date

_____
Signature of Server

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Subpoena #GJ2022112897075

SUBPOENA ATTACHMENT

I. INSTRUCTIONS

A. In complying with this subpoena, you are required to produce all responsive documents, records, information, and communications that are in your possession, custody, or control, whether held by you or your past or present agent, employee, or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.

B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded, or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.

C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.

D. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.

E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

II. DEFINITIONS

A. "**Document**" means any written, recorded, or graphic material of any kind that is in your possession, custody or control. The term includes, but is not limited to: contracts; agreements; letters; telegrams; interoffice communications; memoranda; notes; reports; analyses; worksheets; spreadsheets; notebooks; surveys; lists; outlines; schedules; pamphlets; newsletters; flyers; charts; logbooks; tabulations; compilations; studies; books; records; telephone books or messages; visitor books; calendar or diary entries; desk or appointment calendars; drafts; business cards; minutes or meetings or conferences; notes or memos or other records of telephone or other conversations or communications; electronic transmissions (including emails, text messages, instant messaging, chat rooms, electronic bulletin boards, and any communications using applications such as WhatsApp, Telegram, or Signal); ledgers; financial statements; bank statements; check images (front and back); bills or invoices; purchase orders; receipts; photographs; microfilm; microfiche; audio and video tape or disc recordings; computer printouts; and communications. It also

includes electronically stored data and electronic files, stored on file servers, e-mail servers, hard drives, or other electronic storage media within your control from which information can be obtained either directly or by translation through detection devices or readers. Any such document is to be produced in reasonably usable form, electronic and searchable, along with instructions for reading the data. Any such electronically stored information must be preserved in its native format. The term "document" includes the original (or a copy thereof if the original is not available) and all copies that differ in any respect from the original or that bear any notation, marking or information not on the original. "Document" shall also include all documents, materials, transmissions, and information, including Electronically Stored Information within the meaning of the Federal Rules of Civil Procedure.

B. "**Electronically Stored Information"** or "**ESI**" shall mean the complete original and any non-identical copy (whether different from the original because of notations, different metadata, or otherwise), regardless of origin or location, of any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, personal digital assistants ("PDAs"), computer tablets, or other mobile devices; or other storage media.

C. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, regarding, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

D. The terms "**including**" and "**includes**" shall be construed broadly so that specification of any particular type of document shall not be construed to exclude other types of documents that are nevertheless responsive but not specifically identified.

E. "**Communications**" refers to exchanges kept in any form, whether written, electronic, e-mail, Protonmail, text, instant message, WhatsApp message, Telegram message, Signal message, telephone, or other, and is meant to be interpreted broadly in accordance with federal law.

F. "**Certification**" shall mean any proceeding in the United States Congress on January 6, 2021, convened in order to count the electoral votes, resolve any objections, certify their validity, and announce the result.

G. **"Rally"** shall mean any January 2021 rally or event in Washington, D.C., held with a primary or partial purpose to advocate in favor of or in opposition to certification of the results of the November 2020 Presidential election.

H. **"DOJ"** shall mean United States Department of Justice.

I. Entities identified by name shall be construed broadly to include any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor.

III. REQUEST FOR DOCUMENTS

A. For the period October 1, 2020, through the present, all documents and communications:

1. Relating to efforts to contest the 2020 Presidential Election.

2. Relating to the Certification.

3. Relating to the Rally.

4. Relating to or constituting any evidence (a) tending to show that there was fraud of any kind in or relating to the 2020 Presidential Election, or (b) used or relied upon to support any claim of fraud in relation to the 2020 Presidential Election.

5. Relating to any information conveyed to you or to any other person challenging, rebutting, undercutting, tending to show, or claiming that there was not fraud in the 2020 Presidential Election, or claiming or tending to show that any allegation of fraud was unfounded, baseless, or incorrect in whole or in part.

6. Submitted to, received from, or involving any local, state, or federal public official relating to (a) any claim of fraud in relation to the 2020 Presidential Election, including any presentation made to any such public official regarding the 2020 Presidential Election, or (b) any effort to persuade any such public official to change or affect the results of the 2020 Presidential Election, or delay certification of the results of that election.

7. To, from, with, or involving any member of law enforcement relating to any allegation of fraud or lack of fraud in the 2020 Presidential Election;

8. Relating to the signing, mailing, or delivery of any document purporting to be a Certificate certifying electoral votes in favor of Donald J. Trump and/or Michael R. Pence.

9. Relating to any effort, plan, or attempt to have any person serve as an Elector in favor of Donald J. Trump and/or Michael R. Pence.

10. Relating to any strategies or options for ensuring the certification of Donald J. Trump as the victor of the 2020 Presidential Election.

11. Relating to any claim that the Vice President and/or the President of the Senate had the authority to reject or choose not to count presidential electors, to delay the certification of electors, to adjourn the Certification,

or to direct that a State or States reconsider or re-evaluate its slate of presidential electors.

12. Relating to potential, ongoing, or desired election fraud investigations within or by the DOJ.

13. Relating to efforts to install Jeffrey Clark as Acting Attorney General.

14. Relating to the letter drafted by Jeffrey Clark to be sent to elected officials in Georgia and other states suggesting that the DOJ had identified serious concerns that may have impacted the outcome of the election.

B. For the period of October 1, 2020, through the present, all documents and communications relating to Jeffrey Clark.

C. For the period of October 1, 2020, through the present, regardless of subject matter, all documents and communications to, from, with, or including Jeffrey Clark.

D. For the period of October 1, 2020, through January 20, 2021, regardless of subject matter, all documents and communications to, from, with, or including:

1. Any member, employee, or agent of the Legislative Branch of the U.S. government.

2. Any member, employee, or agent of Donald J. Trump or any organization advocating in favor of the 2020 re-election of Donald J. Trump, including "Donald J. Trump for President, Inc."

3. Any member, employee, or agent of: (a) the White House; (b) the Executive Office of the President; or (c) the Executive Office of the Vice President.

4. Any member, employee, or agent of the United States Department of Justice, or any component, branch, litigating unit, or office of DOJ.

5. Kenneth Klukowski

6. Bernard Kerik

7. Mike Roman

8. James Troupis

9. Jenna Ellis

10. Joe DiGenova

11. John Eastman

12. Kenneth Chesebro

13. Rudy Giuliani

14. Sidney Powell

15. Victoria Toensing

16. Cleta Mitchell

17. Bruce Marks

E. All documents and communications relating to the planning, coordination, funding of, fundraising related to, compensation for participation in or attendance at, or intent of the Rally and subsequent march to the U.S. Capitol.

F. All documents and communications relating to any compensation received or provided, monetary or otherwise, for or related to (1) efforts to contest the 2020 Presidential Election; (2) the certification of the 2020 Presidential Election; and/or (3) the Rally.

G. All documents and communications relating to the Save America PAC, including, but not limited to, documents related to the formation of the Save America PAC, the funding of the Save America PAC, and/or the use of money received by the Save America PAC.

H. For the period October 1, 2020, through the present, documents sufficient to show any email accounts, social media accounts, telephone numbers, messaging applications, or other methods of electronic communication that you used.

I. Any and all documents or other materials produced to the House Select Committee to Investigate the January 6th Attack on the United States Capitol, whether pursuant to subpoena, voluntarily, or otherwise; and any documents responsive to any subpoena served upon you or your agent by the Committee, regardless of whether previously produced.

Subpoenaed materials may be produced to:

Daniel A. Mehochko
Special Agent
FBI Washington Field Office
[redacted]

U.S. Department of Justice

Jack Smith
Special Counsel

950 Pennsylvania Ave. NW
Room [redacted]
Washington, DC 20530

April 20, 2023

VIA Hand Delivery

Wells Fargo Bank, N.A.
[redacted]
Attn: Legal Order Processing Department

Re: Grand Jury Subpoena #GJ20230419-E0312

Dear Sir or Madam:

Pursuant to a criminal investigation being conducted by the Department of Justice it is required that you furnish the requested records as described in the attached subpoena.

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records. If you choose to provide the requested records voluntarily, please provide them in a non-proprietary electronic format via FedEx, UPS or DHL. Also enclosed please find a blank "Declaration of Custodian of Records" form. It may save time and costs if an appropriate person at your business could complete the form and return it with the records. A properly completed "Declaration of Custodian of Records" form will make it more likely that we could present the records at trial without requiring you or another employee to come to court and testify.

Under the Right to Financial Privacy Act, 12 U.S.C. § 3401 et seq., financial institutions responding to a grand jury subpoena for production of certain financial records are entitled to reimbursement for some of the costs involved in compliance. Reimbursement may be made only in connection with the following types of financial reports: checking, savings, share, loan or credit card account records pertaining to accounts of individuals or partnerships of five or fewer partners. **Please note that under the Act, the Department of Justice will not reimburse expenses incurred when the request is for records relating to accounts of corporations, partnerships of more than five partners, associations, trusts, government agencies, or other legal entities.** Payment will only be given for records produced electronically, except in cases where financial institutions demonstrate that they only keep hard copy files in-house.

NO REIMBURSEMENT WILL BE MADE WITHOUT (1) A FULL AND COMPLETE ITEMIZED STATEMENT OF ALL COSTS BEARING YOUR TAXPAYER IDENTIFICATION NUMBER, (2) A COPY OF THE SUBPOENA, and (3) A COMPLETED OBD-211 FORM.

When a subpoena requests records for accounts qualifying for reimbursement as well as accounts not qualifying for reimbursement, the invoice must make clear that the expenses being billed are only for records qualifying for reimbursement. Moreover, no reimbursements will be paid for partial compliance with the grand jury subpoena. Accordingly, no invoice should be submitted to this office until compliance with the grand jury subpoena is complete, and the accompanying invoice represents a final and complete invoice for all qualified costs involved in that compliance. Please submit all invoices directly to the Assistant Special Counsel at the address indicated in this letterhead.

Additionally, you are hereby notified that civil and criminal penalties exist for making certain disclosures regarding this subpoena. The prohibited notifications and applicable penalties are set forth in Sections 943 and 962 of FIRREA, codified at 12 U.S.C. § 3420(b) and 18 U.S.C. § 1510(b).

DISCLOSURE BY YOU OR ANYONE AFFILIATED WITH YOUR INSTITUTION OF THE EXISTENCE OF THIS SUBPOENA, OR THE ITEMS REQUESTED BY IT, MAY CONSTITUTE A CRIMINAL OFFENSE PUNISHABLE BY IMPRISONMENT FOR UP TO FIVE YEARS.

We appreciate your cooperation in this matter. If you have any questions, please contact this office at the number below.

Sincerely,

JACK SMITH
SPECIAL COUNSEL

By: */s/ Erin B. Pulice*_____
Erin B. Pulice
Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
[redacted]

UNITED STATES DISTRICT COURT

for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Wells Fargo Bank, N.A.
[redacted]

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:	Date and Time:
U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3rd Floor Grand Jury #[redacted] 333 Constitution Avenue, N.W. Washington, D.C. 20001	Thursday, May 4, 2023 at 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

In lieu of personally appearing before the Grand Jury on the date indicated, you may comply with this grand jury subpoena by promptly providing the agent designated in the attachment with the requested records.

Date: April 20, 2023

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Erin B. Pulice, Assistant Special Counsel
950 Pennsylvania Ave. NW, Room [redacted]
Washington, DC 20530
Email: [redacted]

Subpoena #GJ20230419-E0312

U.S. Department of Justice
Washington, D.C. 20530

Request for Financial Information Authorization, Purchase Order, Receiving Report

This form shall only be used when requesting financial records of individuals and partnerships of five or fewer individuals

1 Purchase Order Number:	2 Date Order Prepared:	3 Case Number: (*Optional*)
GJ20230419-E0312	4/19/2023	

Section A - Authorization and Purchase Order

4 Name and Address of Financial Institution:

Wells Fargo Bank, N.A.

A. _____ (Funds available / Amount / Date)

B. _____ (Approving Official / Date)

5 Deliver To: Erin B. Pulice
[redacted]

6 Return Date: 5/4/2023

7 Remarks: Do not proceed with compliance if the total cost will exceed $200.00 without prior approval. To obtain approval, call the requestor listed in item 8. If invoicing for these services is expected to exceed 120 days, please notify the United States Attorney's Office immediately to ensure funds remain available for payment.

8 Name of Requestor: (*Type or Print*)	9 Email:	10 Date of request:
Erin B. Pulice	[redacted]	4/20/2023

Section B - Financial Institution Invoice

No Payment Shall Be Made Unless Expenses Are Itemized Below Or On Your Form To Be Attached.

11 Service/Financial Records provided:	Quantity	Unit Price Cost	Unit Price Per	Amount
Federal Tax ID number (TIN) and Data Universal Numbering systems (DUNS) required before payment can be made **Tax ID#**_____ **DUNS#**_____				
12 Signature of Financial Institution Official:	13 Date Signed:	Total Amount Claimed By Financial Institution		
Section C – Receiving Report		16 Disallowance (*See Attached*)		
14 I certify that the articles and services listed were received:	15 Date Received:	17 Net to Financial Institution		

18 Right to Financial Privacy Act – Public Law 95-630
(12 U.S.C. 3401-3422) Request Pursuant To: (*Check One Only*)

SECTION		OBJECT CLASS
☐ 3404	Customer Authorization	2540
☐ 3405	Administrative Subpoena or Summons	2541
☐ 3406	Search Warrant	2542
☐ 3407	Judicial Subpoena	2543
☐ 3408	Formal Written Request	2544
☒ 3413	Grand Jury Subpoena	2545
☐ 3414	Special Procedures	2546

19 Signature of Approving Official:

20 Accounting Classification Code

FY	FC	1	2	3	4	5	PROJ

21 Schedule and Voucher Number:

DC#

22. Remarks:

The financial records received are those of an individual or partnership of five or fewer individuals

ASC Signature _____ Date _____

FORM OBD-211
APR. 84

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. §1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration. I have knowledge of the record keeping system used by this business; this includes how records are created and maintained.

I am in receipt of a United States District Court Subpoena #GJ20230419-E0312 dated April 20, 2023, signed by Assistant Special Counsel Erin B. Pulice, requesting specified records of the business named below.

Attached hereto are ____ pages of records regarding _____
(Brief description of type of documents being subpoenaed)
_____ responsive to the subpoena. I understand how these responsive documents were created. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records attached hereto:

(1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;

(2) were kept in the course of regularly conducted business activity, in that the records were created and preserved pursuant to established procedures, and were relied upon by an employee or this business; and

(3) were made as part of the regularly conducted business activity as a regular practice, in that the records were created and preserved as part of routine reflections of the normal operations of this business.

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

Executed on _____.
(date)

_____
(signature of declarant)

_____
(name and title of declarant)

_____
(name of business)

_____
(business address)

_____
(business address)

Definitions of terms used above:

As defined in Fed.R.Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed.R.Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.

ATTACHMENT

Issued to: Wells Fargo Bank, N.A.
Attn: Legal Order Processing Department
[redacted]

Method of Service: At physical location

Any and all records in your possession, custody, or control for all accounts and/or trust accounts in the name of, bearing the signatory authority of, or with the ability to be accessed by the named parties below. This includes all records regardless of the individual or entity's interest or authority, be it individual, joint, fiduciary, custodian, executor, guardian, trustee, grantor, grantee, payor, payee, beneficiary, signatory, right of withdrawal, or otherwise.

Documentation listed below for the time period of September 1, 2020 to December 31, 2021 for the following:

1. Jeffrey Clark
   DOB: [redacted]
   SSN: [redacted]
   Associated Address: [redacted]

These records should include, at a minimum, current balances and the following:

CHECKING/SAVINGS ACCOUNT RECORDS:

Any and all documents pertaining to all open or closed checking, savings, NOW, Time, or other deposit or checking accounts in the name of or under signature authority of any of the named parties or entities including, **but not limited to**:

- Signature cards, opening account documents,
- Know Your Customer reports (KYC)
- Corporate board authorization minutes or partnership resolutions
- Bank statements and support for transactions including, but not limited to:
  - Negotiated / canceled checks (front and back)
  - Negotiated purchased cashier's checks (credit copy) and source of funds for cashier's check
  - Deposit slips, items deposited
  - Wire transfers, EFT / ACH payment support, electronic payments
  - Support for bank transfers from other accounts including full bank

account numbers of accounts receiving or sending funds to/from accounts held by the named parties
    - Credit and debit memos
    - All closing withdrawal documents
- Forms 1099, 1089, or back-up withholding documents; IRS disclosures / Tax notifications
- Fraud Investigation reports, CTRs or other filings related to the Bank Secrecy Act.
- Any alerts generated through the banks' transaction monitoring process (e.g. the banks' AML department / software) that included accounts or transactions pertaining to the named parties, regardless if the alert resulted in a regulatory filing. For any alerts, please provide the parameters that were triggered and the supporting documents for any regulatory filing(s).

ACCOUNT INQUIRIES: IP addresses, http cookie data, telephone numbers, and email addresses used to open, access, and make inquiries regarding the accounts.

CREDIT CARD ACCOUNTS/ LOAN RECORDS: All statements and documents pertaining to open or closed bank loans/credit accounts, reflecting loans made to or cosigned by any of the named parties or entities including, but not limited to, complete loan file.

CERTIFICATE OF DEPOSIT (CDs): All documents pertaining to CDs purchased or redeemed by any of the named parties or entities including, but not limited to, method of payments.

TRANSACTIONS: All documents pertaining to all cashier's checks, manager's checks, bank checks, traveler's checks, and money orders purchased or negotiated by any of the named parties or entities, including, but not limited to, the check register, file copies of the checks or money orders, records revealing the date and source of payment for said checks or money orders.

All documents pertaining to wire transfers sent or received by any of the named parties or entities.

SAFE DEPOSIT BOX: All documents pertaining to current or expired safe deposit box rentals by or under the signatory authority of any of the named parties or entities.

BANK DEBIT CARDS: All documents pertaining to open or closed bank debit cards in the name of or under the signatory authority of any of the named parties or entities, including the full 16 digit card numbers and transaction histories.

CORRESPONDENCE: All correspondence with the above persons/entities and/or with third parties regarding the above persons/entities. All memoranda, notes, files, or records relating to meetings or conversations concerning the above persons/entities.

DEFINITIONS AND INSTRUCTIONS:

This subpoena duces tecum requires the production of certain documents (described in Section II of this attachment below) in accordance with the following:

A. "Documents" refers to all written or graphic matter, however produced or reproduced onto any other tangible record, including, but not limited to, all writings or recordings, whether set down in handwriting, typewriting, printing, photostating, photographing, magnetic impulse, computer media, mechanical or electronic recording, or other form of data compilation; as well as all drafts and all versions of such documents, including electronic documents that have been deleted but are retrievable;

B. In referring to an entity, the subpoena refers to such entity irrespective of the names under which it has done business, as well as all of its predecessors, subsidiaries, affiliates, branches, divisions, groups, operations, units, parent organizations; and each of the present and former officers, directors, employees, agents, and representatives of such entity;

C. The individual or entity hereby subpoenaed must submit all documents in its possession, or its custody, or under its control;

D. Documents that "relate to" a given subject matter include all documents that constitute, contain, embody, comprise, reflect, identify, state, refer to, pertain to, respond to, comment on, describe, analyze, or are in any way relevant to that subject, regardless of whether they explicitly mention or name the subject matter.

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS:

General: Electronically stored records shall be produced in electronic form and shall include those records held (1) in your record retention systems; and/or (2) by your technology, data, or other service provider(s).

Text Data: Text data relating to transactions (e.g., core data, history file) shall be produced within a data file: (1) Using delimited ASCII text data format; or (2) within software that can export without loss of data to a non-proprietary file format; or (3) using commonly readable file format set by agreement. Text data files relating to transactions produced according to E.I.A. shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, and amount).

Image Data: Image data shall be produced in graphic data files in a non-proprietary or commonly readable format with the highest image quality maintained. Image data of items associated with specific transactions (e.g., checks, deposits) shall be: (1)

produced in individual graphic data files with any associated endorsements; and (2) linked to corresponding text data by a unique identifier.

Encryption/Authentication: Electronically stored records may be transmitted in an encrypted container. Decryption keys shall be produced separately at the time the data are produced. Authentication, such as hash coding, may be set by agreement.

IN LIEU OF PERSONAL APPEARANCE, YOU MAY COMPLY WITH THIS SUBPOENA BY PROVIDING THE REQUESTED DOCUMENTS IN ELECTONIC FORMAT TO:

Special Agent Jeremy Desor
Federal Bureau of Investigations
Washington Field Office-Northern Virginia Resident Agency/CR13
601 4th Street NW
Washington, DC, 20535
Email address: [redacted]

PLEASE DIRECT ANY QUESTIONS TO:

Special Agent Jeremy Desor, [redacted]
Special Agent Walter Giardina, [redacted]
Forensic Accountant Brian Marchelewski Jr, [redacted]
Forensic Accountant Rachael Bingham, [redacted]
Forensic Accountant Daniel Conger, [redacted]