



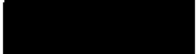
U.S. Department of Justice

Matthew M. Graves
United States Attorney

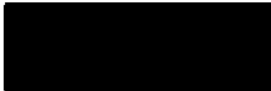
*District of Columbia
Patrick Henry Building
601 D Street N.W.
Washington, D.C. 20530*

September 6, 2022

VIA Hand Delivery



Re: Grand Jury Subpoena #GJ2022090694461
USAO #2022R00150



Enclosed is a subpoena commanding your appearance 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, Tonya Jones, at (202) 252-7133. 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,

Matthew M. Graves
United States Attorney

John D. Crabb, Jr.
J.P. Cooney
Capitol Siege Section

By: /s/ Mary L. Dohrmann
Mary L. Dohrmann
Assistant United States Attorney
601 D Street N.W.
Room #5.723
Washington, DC 20530
202-252-7035
mary.dohrmann@usdoj.gov

UNITED STATES DISTRICT COURT
for the

District of Columbia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

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 # 22-5
333 Constitution Avenue, N.W.
Washington, D.C. 20001

Date and Time:
Friday, September 23, 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: September 6, 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:

Mary L. Dohrmann, Assistant United States Attorney
United States Attorney's Office for the District of Columbia
601 D Street N.W. Room #5.723
Washington, DC 20530
Phone: 202-252-7035 Fax:
Email: mary.dohrmann@usdoj.gov

Subpoena #GJ2022090694461
USAO #2022R00150
Preparer: MRLEACH

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⁾		
<p>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.</p> <p>Executed on _____ <div style="text-align: center;">Date</div></p> <p>_____ Signature of Server</p> <p>_____ Address of Server</p>		
<p>ADDITIONAL INFORMATION</p>		

⁽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 #GJ2022090694461

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 Schreiber;
- 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
damehochko@fbi.gov