



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

July 28, 1997

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Sara R. Wilson, Registered Agent  
Signet Bank  
7 North Eighth Street  
Richmond, VA 23219

RE: MUR 4250

Dear Ms. Wilson:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Commission has issued the attached subpoena and order which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the *express written consent of the person with respect to whom the investigation is made*. You are advised that no such consent has been given in this case.

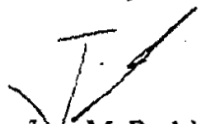
You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information within 30 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

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MUR 4250  
Sara R. Wilson  
Page 2

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jose M. Rodriguez', written over a horizontal line.

Jose M. Rodriguez  
Attorney

Enclosure  
Subpoena and Order

00.04.395.1583

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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MUR 4250

**SUBPOENA TO PRODUCE DOCUMENTS**  
**ORDER TO SUBMIT WRITTEN ANSWERS**

TO: Signet Bank  
c/o Sara R. Wilson, Registered Agent  
7 North Eighth Street  
Richmond, VA 23219

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

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WHEREFORE, the Chairman of the Federal Election Commission has hereunto  
set his hand in Washington, D.C. on this *25th*, day of *July*, 1997.

For the Commission,

  
John Warren McGarry  
Chairman

ATTEST:

  
Marjorie W. Emmons  
Secretary to the Commission

Attachments  
Document Requests and Interrogatories (5 pages)

00.04.395.1585

## **INSTRUCTIONS**

In answering these interrogatories and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information. If you have no responsive information to an interrogatory or document request. Affirmatively state such in response to the interrogatory or document request.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1993 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

## **DEFINITIONS**

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"Signet Bank" shall mean the named witness in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

The "NPF" shall mean the National Policy Forum, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean both sides of the original and all non-identical copies, including electronic copies and drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, calendars, appointment books, transcripts, vouchers, accounting statements, bank account statements, ledgers, checks, money orders, verifications of wire transfers, or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document, all attachments, notes or other communications accompanying the document and the source of any handwritten notations.

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"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the occupation or position of such person at the time of the involvement in the activity at issue, and all positions ever held with the NPF, the RNC, the NRSC or the NRCC. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"Describe" with respect to a communication shall mean state the subject of the communication and the date, location and duration of the communication. Identify all persons participating in the communication and state each person's substantive participation in the communication.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**DOCUMENT REQUESTS AND INTERROGATORIES**

1. List each loan made by Signet Bank to the NPF. Separately for each listed loan:
  - a. State the date the loan became effective;
  - b. State the total amount of the loan;
  - c. State if the loan was a collateral, guaranteed or otherwise secured loan. If so, state the type of security provided and the amount or value of such security, and identify the source for the security, including the account from which the security was transferred or otherwise provided and the account into which the security was deposited;
  - d. Describe and produce all documents concerning, relating to, or referencing each loan and each security, including all loan documents and all bank statements for the account from which the security was provided and the account into which the security was deposited;
  - e. State the date(s) the loan proceeds were disbursed and identify by bank name, holder and account number the account(s) into which the loan proceeds were deposited by recipient. For each identified account, produce bank statements for the full period that the loan remained outstanding;
  - f. State the date(s) when repayment(s) was made to satisfy the loan and identify by bank name, holder and account number the account(s) from which payment was made. For each identified account, produce bank statements for the full period that loan remained outstanding;
  - g. State if the security on the loan was used to satisfy any portion of the outstanding balance. If so, state the date the security was seized, and the amount of the outstanding balance satisfied by the security;
  - h. Describe and produce all documents concerning, relating to, or referencing each disbursement of proceeds, each repayment and each seizure of security, including all written correspondence;

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- i. Describe in detail the purpose and substance of all non-written communications concerning, relating to, or referencing each loan, each disbursement of proceeds, each repayment and each seizure of security. For each communication, separately state the date of the communication, the time of the communication, the location where the communication occurred, and identify each person involved in the communication and describe in detail their substantive participation in the communication.
  - j. For each non-written communication described in response to question 1(i) above, identify and produce all documents concerning, relating to, or otherwise referencing each such communication, including but not limited to calendar entries, appointment books, telephone logs, meeting agendas, handwritten notations and transcripts of the communication.
2. To the extent not identified and produced in response to the preceding questions, identify and produce all documents, containing, relating to, or referencing each loan, each disbursement of proceeds, each repayment and each seizure of security with regard to the NPF.
  3. Identify each person who provided any information used in the preparation of the responses to these questions and for each person identified, describe for which question the information was used.

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