



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 16 2016

Via Overnight Mail and Electronic Mail

Ana Sol Alliegro

Miami, FL 33155

RE: MUR 6655

Dear Ms. Alliegro:

On September 11, 2013, you were notified that the Federal Election Commission found reason to believe you knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A), 441f, and 441g (now 52 U.S.C. §§ 30116(a)(1)(A), 30122 and 30123), provisions of the Federal Election Campaign Act of 1971, as amended.

On December 15, 2016, pursuant to its investigation of these matters, the Commission issued the attached subpoena and order requiring you to provide information that will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. It is required that you submit all answers to questions under oath within 30 days of your receipt of this subpoena and order.

If you have any questions, please contact me at (202) 694-1385.

Sincerely,

A handwritten signature in black ink, appearing to read "Ana J. Peña-Wallace".

Ana J. Peña-Wallace
Attorney

Enclosures
Subpoena and Order

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 6655

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

TO: Ana Sol Alliegro

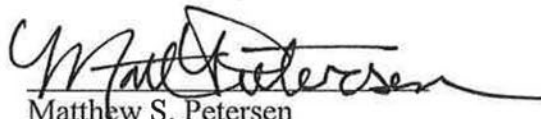
[REDACTED]
Miami, FL 33155

Pursuant to 52 U.S.C. § 30107(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.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C., on this 15th day of December, 2016.

On behalf of the Commission,



Matthew S. Petersen
Chairman

ATTEST:



Dayna Brown
Acting Secretary and Clerk of the Commission

Attachments

Instructions and Definitions

Questions and Document Requests

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INSTRUCTIONS

In answering these written questions 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 question 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 written response.

If you cannot answer the following questions 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.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following questions 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, these discovery requests shall refer to the time period from January 1, 2012 through the present time.

The following questions 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:

“You” shall mean the person to whom these discovery requests are addressed, including your agents and attorneys.

“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.

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“Sternad Campaign” or any variation thereof, shall mean Lamar Sternad for Congress, which was Justin Lamar Sternad’s campaign organization in connection with his election for the United States House of Representatives, including employees and volunteers.

“Document” shall mean the original and all non-identical copies, including 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, electronic mail, transcripts, vouchers, accounting statements, ledgers, checks, money orders 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, including any information saved electronically or which may have been created or stored on websites such as social media sites.

“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.

“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 nature of the connection or association that person has to any party in this proceeding. 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.

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

“Communication” shall be deemed to include both singular and plural, and to include written, oral, telephonic and electronic communications.

QUESTIONS AND DOCUMENT REQUESTS

1. State whether you provided any of your own personal funds to Justin Lamar Sternad or the Congressional campaign of Justin Lamar Sternad from April 1, 2012 through August 31, 2012.
2. If the answer to Question 1 is yes, please provide the following information for any of your own personal funds that you provided to Justin Lamar Sternad or the Congressional campaign of Justin Lamar Sternad:
 - a. The amount;
 - b. The date provided;
 - c. The person to whom you transmitted the funds;
 - d. The form of the funds (e.g., cash, check, money order, etc.);
 - e. The source of the funds and any identifying information regarding the source (e.g., bank account number, check number, money order number, etc.)
 - f. The purpose for which you provided the funds;
 - g. Any person with whom you discussed the provision of these funds;
 - h. A description of each conversation you had regarding the provision of your personal funds to Justin Lamar Sternad or the Congressional campaign of Justin Lamar Sternad;
 - i. Produce all documents including but not limited to bank statements, copies of cancelled checks, deposit or withdrawal slips, correspondence, and calendar entries, relating to the funds you provided.
3. State whether you had any role in providing funds belonging to any other individual or entity to Justin Lamar Sternad or the Congressional campaign of Justin Lamar Sternad from April 1, 2012 through August 31, 2012.
4. If the answer to Question 3 is yes, please provide the following information regarding any instance in which you played a role in providing another individual or entity's funds to Justin Lamar Sternad or the Congressional campaign of Justin Lamar Sternad from April 1, 2012 through August 31, 2012:
 - a. A description of your role;
 - b. The amount of funds;
 - c. Identify the person(s) who provided the funds;
 - d. The person to whom you transmitted the funds, if applicable;
 - e. The form of the funds (e.g., cash, check, money order, etc.);
 - f. The purpose for which the funds were provided;
 - g. Any person with whom you discussed the provision of these funds;
 - h. Describe each conversation you had regarding the provision of these funds;

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- i. Produce all documents including but not limited to bank statements, copies of cancelled checks, deposit or withdrawal slips, correspondence, and calendar entries, relating to the funds that were provided.
5. State whether you and David Rivera discussed providing funds to the federal Congressional campaign of Justin Lamar Sternad. If the answer is yes, provide the following information for each such discussion:
 - a. State the date and location of the discussion;
 - b. Identify all persons present during the discussion;
 - c. State whether the discussion happened in person, over the phone, or by some other means of communication;
 - d. Describe the substance of the discussion;
 - e. Produce any documents relating to or referencing the discussion.
6. State whether you and Justin Lamar Sternad discussed providing funds to his federal Congressional campaign. If the answer is yes, provide the following information for each such discussion:
 - a. State the date and location of the discussion;
 - b. Identify all persons present during the discussion;
 - c. State whether the discussion happened in person, over the phone, or by some other means of communication;
 - d. Describe the substance of the discussion;
 - e. Produce any documents relating to or referencing the discussion.
7. State whether you or any other individuals provided instructions to Justin Lamar Sternad or anyone associated with his federal Congressional campaign about how to disclose the funds used to make contributions to the campaign in reports to be filed with the Federal Election Commission. If the answer is yes, describe those instructions, identify all individuals involved, and produce all documents and communications relating to those instructions.