



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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

**SEP 16 2019**

BNP Paribas  
787 Seventh Avenue  
New York, NY 10019

RE: MUR 6997

To whom it may concern,

The Federal Election Commission (the "Commission") has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended. The Commission has issued the enclosed Subpoena to Produce Documents and Order to Submit Written Answers to Questions, directed to BNP Paribas in connection with an investigation that the Commission is conducting. The Commission does not consider BNP Paribas a respondent in this matter, but rather a witness only.

Please be advised that 52 U.S.C. § 30109(a)(12) prohibits making public any Commission investigation without the written consent of the person with respect to whom such investigation is made. You are advised that no such consent has been given in this case.

If the documents we have requested incur production costs for the Commission, before processing please send or email a written estimate or invoice pertaining to all costs involved in the processing of this request. The email address is rwolcott@fec.gov.

Should you determine that any of the accounts referenced in this subpoena were personal accounts in the name of Cary Peterson or any other individual, please inform us immediately so that we can ensure compliance with the Right to Financial Privacy Act, 12 U.S.C. § 3401, et seq.

If you have any questions please contact me at (202) 694-1302.

Sincerely,

A handwritten signature in black ink, appearing to read "RW".

Ray Wolcott  
Attorney

Enclosures  
Subpoena and Order

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

) MUR 6997  
)  
)**SUBPOENA TO PRODUCE DOCUMENTS**  
**ORDER TO SUBMIT WRITTEN ANSWERS**

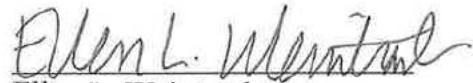
TO: BNP Paribas  
 16 boulevard des Italiens – 75009  
 Paris, France

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.

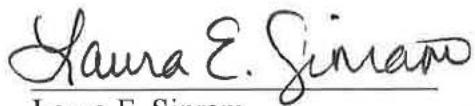
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 1050 First Street, N.E., Washington, D.C. 20463, along with the requested documents within 30 days of your receipt of this subpoena, or within 15 days of your receipt of the Commission's Certification of Compliance with the Right to Financial Privacy Act if the documents pertain to a personal account. Legible copies which, where applicable, show both sides of the documents may be substituted for originals. Please notify Ray Wolcott, the attorney assigned to this matter, at (202) 694-1302 or [rwlcott@fec.gov](mailto:rwlcott@fec.gov) before incurring any costs associated with your response to this subpoena for which you may seek reimbursement.

WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington, D.C., on this 19th day of Sept. 2019.

On behalf of the Commission,

  
 Ellen L. Weintraub  
 Chair

ATTEST:

  
 Laura E. Sinram  
 Acting Secretary and Clerk of the Commission

Attachments  
 Instructions and Definitions  
 Questions and Document Requests

## INSTRUCTIONS

In answering these questions and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that are in your possession, 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 interrogatory 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 the following interrogatories and subpoena for 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.

Mark each page with identification and consecutive document control numbers (*i.e.*, Bates numbers). Provide a master list showing the name of each person from whom responsive documents are submitted and the corresponding consecutive document control numbers used to identify that person's documents.

The discovery request shall refer to the time period from January 1, 2015, to the present.

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.

All responses must be submitted under oath or affirmation under penalty of perjury, including any response that you have no responsive documents.

## DEFINITIONS

For the purpose of this subpoena to produce documents, including the instructions thereto, the terms listed below are defined as follows:

“You” shall mean BNP Paribas, to whom the subpoena is addressed, including all employees and agents thereof.

“Person” 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, group or entity.

“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, electronic mail, social media postings, messages sent via Twitter, instant messages, text messages, contracts, notes, diaries, log books, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, financial records, calendar entries, appointment records, 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. If the document request calls for a document that is maintained on or in a magnetic, optical, or electronic medium (for example, but not limited to, computer hard drive, USB drive, or CD-ROM), provide both “hard” (*i.e.*, paper) and “soft” (*i.e.*, in the magnetic or electronic medium) copies, including drafts, and identify the name (*e.g.*, Microsoft Word for Windows, WordPerfect) and version numbers of the software by which the document(s) will be most easily retrieved.

“Record” shall mean the original and all non-identical copies, including drafts, of all papers and documents of every type in your possession, custody, or control, or known by you to exist. The term “record” includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, 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. The term “record” also includes electronic data, copies and all temporary and permanent storage devices under your control, including but not limited to, hard drives, servers, CD-ROMs, discs, jaz discs, zip disks, tape storage and tape back-up systems, CDs and optical back-up systems, electronic logs, e-mail and e-mail back-up systems. If a record is maintained on or in a magnetic or electronic medium (for example, but not limited to, computer tape, diskette, or CD-ROM), provide both “hard” (*i.e.*, paper) and “soft” (*i.e.*, in the magnetic or electronic medium) copies, including drafts, and identify the name (*e.g.*, ASCII data files, WordPerfect, Microsoft Word for Windows, Pro Write, etc.) and version numbers by which the records will be most easily retrieved.

MUR 6997  
Order and Subpoena to BNP Paribas  
Page 4 of 6

“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, and the number of pages comprising the document.

“Identify” with respect to a person shall mean state the full name, the most recent business and residential addresses and the corresponding telephone numbers, e-mail addresses, the present occupation or position of such person, the occupation or position of such person during the relevant time period, and 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 interrogatories and requests for production of documents any documents and materials that 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. For all accounts opened on behalf of “Americans Socially United,” “Ready for Bernie Sanders 2016,” “Bet on Bernie 2016,” and “Bet on Bernie Sanders 2016:”
  - a. identify the account number(s), the date the account(s) was opened, and the date the account(s) was closed; and
  - b. identify the person(s) who opened the account(s) and all persons authorized to access the account(s) and the funds held within, including names, addresses, phone numbers and e-mail addresses.
2. For each account identified in response to Question 1, above, identify and produce documents and records related to all transactions made from January 1, 2015, to the present, including, but not limited to:
  - a. all documents related to opening the accounts, including, but not limited to, the account application;
  - b. bank signature card or any other document(s) designating or assigning any person access to the account(s) or to the funds held within;
  - c. monthly or other periodic statements documenting transactions;

MUR 6997  
Order and Subpoena to BNP Paribas  
Page 5 of 6

- d. deposit tickets for deposits made to the account, or any record of deposits or credits made to the account;
  - e. records of all withdrawals made from the account, including copies of all cancelled checks (front and back) and other records of withdrawal;
  - f. records of all incoming and outgoing transfers of funds made to or from the account(s); and
  - g. all documents related to closing of the account(s), including but not limited to, the account closing form.
3. If accounts for the entities listed in Question 1 do not exist, identify any accounts opened (1) by Cary Peterson or (2) using any of the following addresses
    - a. 858 N. Rainbow Blvd, Suite 3419, Las Vegas, NV 89107.
    - b. 848 N. Rainbow Blvd, Las Vegas, NV 89107.
    - c.
    - d.
    - e. 100 Congress Ave 2000, Austin, TX 78701.
    - f. 5832 Lincoln Dr 118, Minneapolis, MN 55436.
    - g.
    - h. 6619 N Scottsdale Rd, Scottsdale, AZ 85250.
    - i. 2500 Plaza 5, 25th Floor, Harborside Financial Center, Jersey City, NJ 07311.
  4. For all accounts identified for Question 3:
    - a. identify the account number(s), the date the account(s) was opened, and the date the account(s) was closed; and
    - b. identify the person(s) who opened the account(s) and all persons authorized to access the account(s) and the funds held within, including names, addresses, phone numbers and e-mail addresses.
  5. For each account identified in response to Question 3, above, identify and produce documents and records related to all transactions made from January 1, 2015, to the present, including, but not limited to:
    - a. all documents related to opening the accounts, including, but not limited to, the account application;

MUR 6997  
Order and Subpoena to BNP Paribas  
Page 6 of 6

- b. bank signature card or any other document(s) designating or assigning any person access to the account(s) or to the funds held within;
  - c. monthly or other periodic statements documenting transactions;
  - d. deposit tickets for deposits made to the account, or any record of deposits or credits made to the account;
  - e. records of all withdrawals made from the account, including copies of all cancelled checks (front and back) and other records of withdrawal;
  - f. records of all incoming and outgoing transfers of funds made to or from the account(s); and
  - g. all documents related to closing of the account(s), including, but not limited to, the account closing form.
6. Produce records of communications you held with Cary Peterson and describe the substance of all such communications.