



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

August 28, 2019

TO: The Commission

FROM: Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel for Enforcement

BY: Stephen Gura *SG*  
Deputy Associate General Counsel

Jin Lee *JL*  
Acting Assistant General Counsel

CJ Pavia *CP*  
Attorney

SUBJECT: MUR 7271 (DNC, *et al.*)

RE: Circulation of Discovery Documents

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On July 25, 2019, the Commission found reason to believe that Alexandra Chalupa, Chalupa & Associates, LLC, and the Democratic National Committee and William Derrough in his official capacity as treasurer (the "DNC") violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by soliciting, accepting, or receiving a prohibited in-kind foreign national contribution in the form of research from the Ukrainian Embassy in Washington, DC, regarding the Trump campaign, Paul Manafort, and alleged connections to the Russian Federation. In addition, the Commission authorized the use of compulsory process.

On August 1, 2019, we sent notification of the Commission's reason-to-believe findings to Respondents and also provided the Factual and Legal Analysis. On August 22, 2019, Chalupa submitted a detailed response denying the allegations. Chalupa maintains that information she shared with the DNC was not obtained from any foreign government, but from her independent research and work for the Obama White House, State Department, and Congress. The DNC requested, and we approved, a forty-five day extension to respond to the Commission's reason-to-believe findings, with a due date of October 5, 2019.

MUR 7271 (DNC, *et al.*)

Memorandum

Page 2 of 2

Attached for the Commission's approval on a 48-hour no objection basis are: (1) a Deposition Subpoena, Order to Submit Written Answers, and Subpoena to Produce Documents directed to Chalupa and Chalupa & Associates, LLC; (2) an Order to Submit Written Answers and Subpoena to Produce Documents directed to the DNC; and (3) a Deposition Subpoena, Order to Submit Written Answers, and Subpoena to Produce Documents directed to Andrii Telizhenko. The questions and document requests in the subpoenas seek additional information regarding the provision of information from the Ukrainian Embassy to Chalupa, and whether this was ultimately passed to the DNC in a form that would result in an in-kind contribution.

With respect to the subpoenas directed at Chalupa, her response to the Commission's reason-to-believe findings was elaborate and requires further exploration. While it appears that she wants to cooperate with the investigation, we think that a deposition is the appropriate fact-finding mechanism, given the gravity of the allegations here. Regarding the subpoenas directed at the DNC, we will await DNC's response to the reason-to-believe findings and will only serve the subpoenas if necessary. The subpoenas directed at the DNC request all communications between the DNC and Chalupa, which would likely capture any instances when Chalupa provided research from the Ukrainian Embassy.

Finally, with respect to the subpoenas directed at Andrii Telizhenko, obtaining his statement for the record is especially important because he is the only witness who claims that Chalupa solicited and received opposition research from the Ukrainian Embassy. Telizhenko, a former political officer at the embassy, stated in a January 11, 2017, *Politico* article that he was instructed to help Chalupa research connections between Trump, Manafort, and Russia. He explained that the Ukrainian Embassy was "coordinating an investigation" with Chalupa and "the Hillary team," and "worked very closely" with Chalupa. These statements were the primary support for the finding that Chalupa may have solicited and received something of value. We believe it likely that Telizhenko will cooperate with the investigation — he has made statements on his public social media pages calling for an investigation, and has spoken with multiple journalists about the events in question. Again, given the gravity of the allegations, a deposition may be necessary to adequately capture, under oath, the necessary facts. Telizhenko lives in Ukraine, but his social media accounts confirm that he regularly travels to the United States.

We recommend using compulsory process at this time given the importance of obtaining sworn statements and the statute of limitations, which begins to run in early 2021. Accordingly, we request that the Commission approve the attached subpoenas on a 48-hour no objection basis.

Attachments:

1. Deposition Subpoena, Order to Submit Written Answers, and Subpoena to Produce Documents directed to Chalupa and Chalupa & Associates, LLC
2. Order to Submit Written Answers and Subpoena to Produce Documents directed to the Democratic National Committee and William Derrough in his official capacity as treasurer; and
3. Deposition Subpoena, Order to Submit Written Answers, and Subpoena to Produce Documents directed to Andrii Telizhenko

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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MUR 7271

**DEPOSITION SUBPOENA**  
**ORDER TO SUBMIT WRITTEN ANSWERS**  
**SUBPOENA TO PRODUCE DOCUMENTS**TO: Alexandra Chalupa  
Chalupa & Associates, LLC

Washington, DC 20008

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, 1050 First Street, NE, Washington, DC 20463, along with the requested documents within 30 days of your receipt of this Subpoena and Order.

In addition, pursuant to 52 U.S.C. § 30107(a)(3), the Commission hereby subpoenas you to appear for a deposition with regard to this matter. Notice is hereby given that the deposition is to be taken on November 21, 2019, unless an alternative date is mutually agreed on, at the Office of General Counsel, Federal Election Commission, 1050 First Street NE, Washington, DC 20463, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington, DC, on this \_\_\_\_ day of \_\_\_\_\_ 2019.

On behalf of the Commission,

\_\_\_\_\_  
Ellen L. Weintraub  
Chair

ATTEST:

\_\_\_\_\_  
Laura E. Sinram  
Acting Secretary and Clerk of the CommissionAttachments  
Instructions and Definitions  
Questions and Document Requests

### **INSTRUCTIONS**

1. In answering these written 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.
2. 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.
3. 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.
4. 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.
5. Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by 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.
6. 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.
7. Unless otherwise specified, these requests shall refer to the time period from January 2015 through the present.
8. 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.
9. 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 these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

1. “DNC” shall mean Democratic National Committee and William Derrough in his official capacity as treasurer, and any employees, agents, and other individuals acting for or on its behalf.
2. “You” shall mean Alexandra Chalupa, Chalupa & Associates, LLC, and any employees, agents, and other individuals acting for or on their behalf.
3. “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.
4. “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.
5. “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.
6. “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.

7. “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.
8. “Communication” shall be deemed to include both singular and plural, and to include written, oral, telephonic and electronic communications.

### **QUESTIONS AND DOCUMENT REQUESTS**

1. Produce all communications between you and the DNC regarding the Ukrainian Embassy, the Donald J. Trump campaign, Paul Manafort, the Russian Federation, and any other topics not directly related to your work involving ethnic outreach.
2. Identify all DNC employees with whom you communicated, including their job titles and your relationship to any such person.
3. Produce all communications between you and representatives of the Ukrainian Embassy in Washington, DC.
4. Identify all representatives of the Ukrainian Embassy with whom you communicated, including their job titles and your relationship to any such person.
5. List the complete history of your employment, consulting, and volunteer efforts for the DNC, including relevant dates, job titles, and duties and responsibilities. Produce all contracts with the DNC.
6. State whether you provided the DNC with information pertaining to the Donald J. Trump campaign, Paul Manafort, and the Russian Federation.
  - a) Identify the instances when you provided such information to the DNC. If the relevant communications are not available, and thus not produced in response to Request 1, describe the content of the information with as much detail as possible, as well as identify the recipients and describe circumstances that resulted in you providing the information.
  - b) List all sources used to compile the information and the time frame when you acquired such information.
7. State whether you received any information from representatives of the Ukrainian Embassy regarding the Trump campaign, Manafort, or the Russian Federation.
  - a) Identify and describe all such instances pertaining to Request 7, including the persons from the Ukrainian Embassy with whom you communicated and the circumstances that led to the Embassy providing you with information.

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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MUR 7271

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

TO: Democratic National Committee and William Derrough  
in his official capacity as treasurer  
c/o Marc E. Elias, Esq.  
Graham M. Wilson, Esq.  
Perkins Coie LLP  
700 13th Street, NW Suite 600  
Washington, DC 20005-3960

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, 1050 First Street, NE, Washington, DC 20463, along with the requested documents within 30 days of your receipt of this Subpoena and Order.

WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington, DC, on this \_\_\_\_ day of \_\_\_\_\_ 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**

1. In answering these written 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.
2. 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.
3. 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.
4. 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.
5. Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by 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.
6. 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.
7. Unless otherwise specified, these requests shall refer to the time period from January 2015 through the present.
8. 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.
9. 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 these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

1. “You” or “DNC” shall mean Democratic National Committee and William Derrough in his official capacity as treasurer, and any employees, agents, and other individuals acting for or on its behalf.
2. “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.
3. “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.
4. “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.
5. “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.

MUR 7271 (Democratic National Committee)

Order and Subpoena

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6. “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.
7. “Communication” shall be deemed to include both singular and plural, and to include written, oral, telephonic and electronic communications.

**QUESTIONS AND DOCUMENT REQUESTS**

1. Produce all communications between the DNC and Alexandra Chalupa regarding the Ukrainian Embassy, the Donald J. Trump campaign, Paul Manafort, Russian Federation, or any other topic not directly related to Chalupa's work for the DNC regarding ethnic outreach.
2. Identify all DNC employees who communicated with Chalupa.
3. State whether Chalupa provided the DNC with information pertaining to the Donald J. Trump campaign, Paul Manafort, the Russian Federation, or any research not directly related to her responsibilities regarding ethnic outreach.
4. State whether Luis Miranda, or anyone else from the DNC, asked Chalupa to arrange for the President of Ukraine to answer a question from a reporter about Paul Manafort.

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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MUR 7271

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

TO: Andrii Telizhenko

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 General Counsel, Federal Election Commission, 1050 First Street, NE, Washington, DC 20463, along with the requested documents within 30 days of your receipt of this Subpoena and Order.

In addition, pursuant to 52 U.S.C. § 30107(a)(3), the Commission hereby subpoenas you to appear for a deposition with regard to this matter. Notice is hereby given that the deposition is to be taken on November 19, 2019, unless an alternative date is mutually agreed on, at the Office of General Counsel, Federal Election Commission, 1050 First Street N.E., Washington, D.C. 20463, beginning at 10:00 a.m. and continuing each day thereafter as necessary.

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

On behalf of the Commission,

ATTEST:

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 Ellen L. Weintraub  
 Chair

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 Laura E. Sinram  
 Acting Secretary and Clerk of the Commission

Attachments

 Instructions and Definitions  
 Questions and Document Requests

### **INSTRUCTIONS**

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3. 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.
4. 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.
5. Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by 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.
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8. 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.
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1. “DNC” shall mean Democratic National Committee and William Derrough in his official capacity as treasurer, and any employees, agents, and other individuals acting for or on its behalf.
2. “You” shall mean Andrii Telizhenko and any employees, agents, and other individuals acting for or on your behalf.
3. “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.
4. “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.
5. “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.
6. “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.

MUR 7271 (Telizhenko)  
Order and Subpoena  
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7. “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.
8. “Communication” shall be deemed to include both singular and plural, and to include written, oral, telephonic and electronic communications.

**QUESTIONS AND DOCUMENT REQUESTS**

1. With respect to your employment at the Ukrainian Embassy in Washington, DC:
  - a) State the dates of your employment, and list the job titles that you held.
  - b) Describe your duties and responsibilities for each position.
  - c) Identify who you reported to and who reported to you.
  - d) Describe the circumstances of your departure.
2. Identify and describe all instances when you communicated with Alexandra Chalupa.
  - a) Describe any information that Chalupa provided to you regarding the purpose of seeking information regarding the Donald J. Trump campaign, Paul Manafort, or the Russian Federation.
  - b) State whether Chalupa indicated to you that she was working on behalf of the DNC, the Hillary R. Clinton campaign, or any other entity.
3. State whether Oksana Shulyar, Valeriy Chaly, or anyone else from the Ukrainian Embassy asked you to collect information for Chalupa or the DNC.
4. Describe with particularity any information that you collected for Chalupa or the DNC, including steps you took to acquire the information, sources, subject matter, expenses you incurred, and amount of time it took for you to collect the information.
  - a) Identify each separate request for information, when the request was made, and when the information was provided.
  - b) Describe the work product delivered to Chalupa, and how the work product was delivered. Produce such work product in your possession.
5. Produce all available communications between you and Chalupa or the DNC.
6. Describe with particularity any other assistance that the Ukrainian Embassy provided to Chalupa or the DNC.