



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

AUG 01 2019

**VIA OVERNIGHT MAIL**

Facebook Inc.  
Attn: Facebook Security, Law Enforcement Response Team  
1601 Willow Road  
Menlo Park, CA 94025

RE: MUR 7280

Dear Sir or Madam:

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, which requires Facebook, Inc. ("Facebook") to provide certain information in connection with an investigation that the Commission is conducting. The Commission does not consider Facebook to be a respondent in this matter but rather a witness only.

Please be advised that 52 U.S.C. § 30109(a)(12), a federal statute, 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 matter.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to the 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.

If you have any questions, please contact me at (202) 694-1343.

Sincerely,

A handwritten signature in cursive script that reads "Amanda Andrade". To the right of the signature, there is a handwritten note "by SL".

Amanda Andrade  
Attorney

Enclosure  
Subpoena and Order

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	
Unknown Owner of "Trump 2020"	)	MUR 7280
Facebook Page	)	

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

TO: Facebook Inc.  
1601 Willow Road  
Menlo Park, CA 94025  
Attn: Facebook Security, Law Enforcement Response Team

Pursuant to 52 U.S.C. § 30107(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby 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, D.C. 20463, along with the requested documents within 30 days of receipt of this Subpoena. Please notify Amanda Andrade, the attorney assigned to this matter, at (202) 694-1343 or [aandrade@fec.gov](mailto:aandrade@fec.gov) before incurring any costs associated with your response to this subpoena for which you may seek reimbursement.

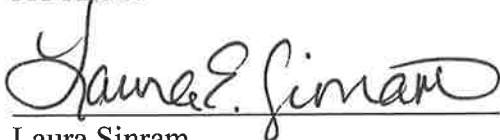
WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington, D.C., on this first day of August, 2019.

On behalf of the Commission,



Ellen L. Weintraub  
Chair

ATTEST:



Laura Sinram  
Acting Secretary and Clerk of the Commission

### **INSTRUCTIONS**

1. In answering these interrogatories and responding to this subpoena to produce 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. If you cannot respond in full after exercising due diligence to secure the full information, produce documents to the extent possible and indicate your inability to produce the remainder, stating whatever information or knowledge you have concerning the unproduced portion and detailing what you did in attempting to secure the additional documents.
4. Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by the following 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.
5. This subpoena to produce documents is 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.
6. 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:

1. "You" shall mean Facebook, Inc., to whom the subpoena is addressed, including all employees and agents thereof.
2. "Facebook Page" shall mean a page or website on the Facebook social-media service for businesses, organizations, or individuals, or any website within the Facebook social-media service that you define as a Facebook Page in the ordinary course of business.

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. "Identify" with respect to a Facebook Page shall mean provide the page name, URL, and page username.
5. "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.
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.

**QUESTIONS AND DOCUMENT REQUESTS**

1. State whether Facebook, Inc., directly or indirectly, received any payments from any person on behalf of the Facebook Page "Trump 2020" (page username: @ElectTrump2020; URL: <https://www.facebook.com/ElectTrump2020>) (hereinafter "ElectTrump2020"), or on behalf of any other Facebook Pages created by the same account responsible for creating ElectTrump2020.
2. If the answer to Question 1 is yes:
  - a. State the name, address (including any email addresses), telephone number, Facebook profile information, and any subscriber number or identity, including any temporarily assigned network address, of the person who created ElectTrump2020;
  - b. Identify each Facebook Page that was created by the person identified in Question 2.a if and only if you received any payment on behalf of that Facebook Page;
  - c. Produce any other documents concerning the customer or subscriber account information for ElectTrump2020 and the Facebook Pages identified in Question 2.b;
  - d. State the amount paid to you for advertising services on behalf of ElectTrump2020 and the Facebook Pages identified in Question 2.b, beginning on November 10, 2016 and continuing to the present;
  - e. Produce all documents related to advertising purchased by any person on behalf of ElectTrump2020 and the Facebook Pages identified in Question 2.b, beginning on November 10, 2016, and continuing to the present, including but not limited to the content of the advertising or paid promotion; and
  - f. For each unique advertisement responsive to this Subpoena, identify the person who purchased the advertisement, the Facebook Page with which it was associated, the time period during which the advertisement was active, the dollar value paid to you, and the means and source of the payment for the advertisement, including any credit card or bank account number.