



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

1 **MEMORANDUM**  
2

3 **TO:** The Commission  
4  
5 **FROM:** Lisa J. Stevenson  
6 Acting General Counsel  
7  
8 Charles Kitcher  
9 Acting Associate General Counsel for Enforcement  
10  
11 **BY:** Stephen Gura *SG*  
12 Deputy Associate General Counsel for Enforcement  
13  
14 Lynn Y. Tran *Lgt by SG*  
15 Assistant General Counsel  
16  
17 Saurav Ghosh *SG*  
18 Attorney  
19  
20 **SUBJECT:** MURs 7350 and 7351 (Christopher Wylie, *et al.*)  
21  
22 **RE:** Circulation of Discovery Documents  
23  
24

25 On July 24, 2019, the Commission found reason to believe that Christopher Wylie  
26 violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) by directly or indirectly participating in  
27 the administration of a U.S. political committee or in a decision-making process in connection  
28 with a committee's election-related spending, and authorized the use of compulsory process.<sup>1</sup>

29 Our investigation in this matter is focused on determining whether Cambridge  
30 Analytica LLC ("Cambridge"), while providing services to U.S. political committees,  
31 employed foreign nationals in roles that involved directly or indirectly participating in the  
32 administration of a U.S. political committee or in a decision-making process in connection  
33 with a committee's election-related spending. Cambridge has declared bankruptcy in the U.S.,  
34 and its affiliated/parent company, SCL Group LTD, is analogously "in administration" in the  
35 United Kingdom; neither company has records or former employees that we can readily access.

<sup>1</sup> Certification ¶¶ 2 and 8, MURs 7350 and 7351 (July 24, 2019).

1 We therefore do not expect to be able to obtain information from Cambridge directly, within  
2 the time we have remaining under the statute of limitations.<sup>2</sup>

3 Wylie, however, was reportedly part of Cambridge from its inception and has publicly  
4 claimed to have first-hand knowledge regarding Cambridge's activities during the 2014  
5 election cycle, when he was employed there. We therefore believe we can obtain information  
6 from him to further the investigation into his and Cambridge's alleged violations of the Act  
7 and Commission regulations. To that end, the attached subpoena seeks information from  
8 Wylie to allow us to determine the extent to which foreign nationals working for Cambridge  
9 provided services to U.S. political committees.

10 We have attempted to locate Wylie to request this information voluntarily, but we have  
11 not been able to reach him. We believe that Wylie is represented by counsel in connection with  
12 U.K. and U.S. investigations into Cambridge's activity — although he did not designate counsel  
13 in these matters before the Commission — but numerous messages to his counsel have not been  
14 returned. As such, we are still in the process of finding a current mailing address, contact email,  
15 or phone number for Wylie.<sup>3</sup> However, because this matter is seriously imperiled by the statute  
16 of limitations, even as we continue our efforts to find Wylie, we request that the Commission  
17 approve the attached subpoena for him on a 48-hour no objection basis.

18  
19 Attachment:

20  
21 Subpoena to Produce Documents and Order to Submit Written Answers to  
22 Christopher Wylie

---

<sup>2</sup> The statute of limitations began running on June 10, 2019.

<sup>3</sup> Publicly available information indicates that Wylie is employed as Director of Research for the Stockholm-based fashion retailer Hennes & Mauritz (H&M), and spends time in multiple cities, including London, New York, Los Angeles, and Stockholm.

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
Christopher Wylie ) MURs 7350 and 7351  
)

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

TO: Christopher Wylie  
**ADDRESS**

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, N.E., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Subpoena and Order.

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

On behalf of the Commission,

\_\_\_\_\_  
Ellen L. Weintraub  
Chairman

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 persons 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 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.
6. Mark each page with identification and consecutive document control numbers (*i.e.*, Bates numbers).
7. 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.
8. 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. “Cambridge Analytica” shall mean Cambridge Analytica LLC as well as any parent, subsidiary, or affiliated company — including Cambridge Analytica LTD, SCL Group LTD, SCL Elections, and SCL USA — and any officers, employees, agents, and other persons acting on behalf of Cambridge Analytica LLC or any parent, subsidiary, or affiliated company.
2. “Committee” shall be deemed to include both singular and plural and shall mean a political committee as defined at 52 U.S.C. § 30101(4), including but not limited to all officers, employees, staff, volunteers, surrogates, or agents thereof.
3. “Committee communication” shall mean all electioneering communications, political advertising, other communications intended to be viewed by the public, and any conveyance or expression of information or views of any kind to the public, including all drafts thereof. The term Committee communication includes, but is not limited to, broadcast, cable, or satellite television and radio signal, newspaper, magazine, book, outdoor advertising facility, mass mailing, electronic or print mailing, leaflets, flyers, telephone bank, text messages sent on a uniform bases to group of public persons, internet site or posting, social media site or posting, rally, speech, interview, or any other form of public communication.
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 printouts, 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 bard 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. “Foreign national” shall be deemed to include both singular and plural and shall mean any person who is not a citizen of the United States or a national of the United States and who is not lawfully admitted for permanent residence in the United States, or a foreign principal as defined at 22 U.S.C. § 611(b).

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.
7. “Identify” with respect to a person shall mean state the full name, the most recent business and residence 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.
8. “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.
9. “Relate” and “Relating” shall mean referencing, discussing, describing, concerning, pertaining, involving, referring, recounting, portraying, depicting, presenting, reporting, or conveying.
10. “Training” shall be deemed to include both singular and plural and shall mean any formal or informal act, process, or method of presenting, supplying, or providing information, guidance, advice, caution, skill or ability development, know-how, means, or wherewithal.
11. “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.
12. “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 your nationality, citizenship, and any U.S. immigration status you held during the time you were employed by Cambridge Analytica, and produce documents related to your status, such as a passport or work authorization.
2. State whether Cambridge Analytica or any U.S. political committee for which you provided services was aware of your nationality, citizenship, and/or U.S. immigration status. Produce all documents related to any knowledge Cambridge Analytica or any U.S. political committee for which you performed services had about your status.
3. Describe each position you held at Cambridge Analytica, including job title, the scope of your duties and responsibilities, the identity of any supervisor or person you reported to, and the dates during which you held each position. Produce all contracts, employment agreements, work proposals, or other written description or discussion of the work you were hired to perform for Cambridge Analytica and the terms of engagement.
4. Describe and produce all documents related to:
  - a. Your involvement in the establishment of Cambridge Analytica;
  - b. Your involvement in the day-to-day operations of Cambridge Analytica;
  - c. The timing and circumstances of your departure from Cambridge Analytica; and
  - d. Your interactions with Cambridge Analytica after your departure.
5. Describe the relationship or affiliation between Cambridge Analytica LLC, Cambridge Analytica LTD, SCL Group LTD, SCL Elections, and SCL USA, including whether these entities shared officers or directors, employees, resources, or intellectual or physical property. In addition:
  - a. Produce documents related to the organizational structure and relationship of these entities;
  - b. Explain what types of services each of these entities offered and where each provided services; and
  - c. Describe which of these entities provided services to U.S. political committees, what services they provided, and when they provided services.
6. With respect to Alexander Nix, Stephen K. Bannon, and Dr. Alexander Tayler, describe and produce documents relating to:
  - a. Your relationship and interactions with each;
  - b. The involvement of each in the establishment and day-to-day activities of Cambridge Analytica; and

- c. Whether each was aware of, or involved with, foreign nationals providing services on behalf of Cambridge Analytica to U.S. political committees.
7. For each U.S. political committee to which Cambridge Analytica provided services, identify the committee and describe whether those services included participation in decisions regarding the following:
  - a. Fundraising and solicitation of contributions for the political committee;
  - b. Determining how the political committee allocated actual or potential expenditures, including the authorization or directing of expenditures, or the budgeting, prioritizing or spending for political committee communications or events;
  - c. Determining how the political committee allocated its resources, or otherwise participating in decisions concerning the political committee's administration, including managing or directing persons employed by, volunteering for, affiliated with, or acting on behalf of or under the direction or control of the political committee;
  - d. Developing, disseminating, or targeting committee communications, including determining the subject matter, theme, message, or content of communications and identifying or determining the target audience for communications;
  - e. Planning or implementing the travel, movement, or appearances of any federal candidate, surrogate, or agent; and
  - f. Any other services performed by Cambridge Analytica for or on behalf of the Committee that were not covered in response to subparts 7.a. through 7.e.
8. For each U.S. political committee to which Cambridge Analytica provided services identified in response to Question 7, identify the committee and describe:
  - a. The services provided, including the tasks and functions involved, goals and objectives, and products or recommendations provided;
  - b. The identity of any officer, director, agent, or employee of Cambridge Analytica who provided services to the committee, the specific functions or tasks they performed, and the dates they provided services;
  - c. The dates that Cambridge Analytica provided services to the committee;
  - d. The physical location, or, if more than one, locations at which Cambridge Analytica provided services;
  - e. The person at the political committee who managed, supervised, or directed the services; and
  - f. The political committee's knowledge of the nationality, citizenship, and/or U.S. immigration status of the person at Cambridge Analytica who provided the services.

9. Identify each person — who you either know is a foreign national or whose nationality, citizenship and/or U.S. immigration status is unknown to you — that was employed by Cambridge Analytica and performed services for a U.S. political committee. Regarding each person identified in your answer, state:
  - a. The person's nationality, citizenship and/or U.S. immigration status;
  - b. The dates during which each person performed services for or on behalf of the Committee;
  - c. The services performed by each person;
  - d. The physical location or, if more than one, locations at which the person performed services for or on behalf of the Committee; and
  - e. The person at the Committee who managed, supervised, or directed the services the person performed for or on behalf of the Committee.
10. Produce all documents relating to your responses to Questions 7, 8, and 9.
11. Describe and produce all documents relating to any formal or informal policies, procedures, trainings, or guidance prepared by or for Cambridge Analytica that you received, or were aware of, regarding the involvement of foreign nationals in the activities of U.S. political committees and produce documents reflecting these policies, procedures, trainings, or guidance.
12. Describe whether you participated in, or were aware of, any discussions regarding legal limitations on the participation of foreign nationals in the activities of a U.S. political committee, and produce all documents relating to any such discussions.
13. In a March 17, 2018, recorded interview with Channel 4 News UK (available at <https://www.channel4.com/news/cambridge-analytica-facebook-profiles-whistle-blower-chris-wylie-election>), you refer to a legal action or suit that Cambridge Analytica filed against you. Please describe that legal action or suit, including its resolution, and describe any other current or past legal action or suit between you and Cambridge Analytica, including the resolution of each such legal action or suit.
14. Produce all documents referenced or relied upon in answering this Subpoena to Produce Documents and Order to Submit Written Answers.