



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Via Certified Mail

James Brown

September 9, 2020

Conroe, TX 77385

RE: MUR 7401

Dear Mr. Brown:

Records or information held by the financial institution named in the attached subpoena have been obtained by the Federal Election Commission (the “Commission”) for the purpose of investigating possible violations of the Federal Election Campaign Act of 1971, as amended, by you in connection with activities conducted by Citizens for Trump during the 2016 election cycle through the present. In accordance with the Right to Financial Privacy Act of 1978, if you desire that such records or information from the personal account indicated in the subpoena not be made available, you must:

1. Fill out the accompanying motion paper and sworn statement, or write one of your own, stating that you are the customer whose records are being requested by the Commission and either give the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice or any other legal basis for objecting to the release of the records;
2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States District Courts: the United States District Court for the Southern District of Texas or the United States District Court for the District of Columbia;
3. Serve the Commission by mailing or delivering a copy of your motion and statement to: Federal Election Commission, Office of the General Counsel, 1050 First St, NE, Washington, D.C. 20463; and
4. Be prepared to come to court and present your position in further detail.

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You do not need a lawyer, although you may wish to employ one to represent and protect your rights. If you do not follow the above procedures, upon the expiration of ten days from the date of service or 14 days from the date of mailing of this notice, the records or information requested therein may be used by the Commission. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event you will be notified after the transfer.

If you have any questions, please contact me at (202) 694-1628.

Sincerely,



Nicholas Bamman
Attorney

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7401
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: PayPal Holdings, Inc.
Global Asset Protection Team
Lawenforcement@paypal.com

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 15 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 Nicholas Bamman, the attorney assigned to this matter, at (202) 694-1628 or nbamman@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 4th day of August 2020.

On behalf of the Commission,

J. E. Trainor, M.D.

James E. "Trey" Trainor III
Chair

ATTEST:

Laura
Sinram

Laura Sinram
Acting Secretary and Clerk of the Commission

