

**FEDERAL ELECTION COMMISSION**

Washington, D.C. 20463

December 30, 2019

By Email Only

Joshua A. Levy, Esq.
Rachel M. Clattenburg, Esq.
Cunningham Levy Muse
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RE: MURs 7291 and 7449

Dear Mr. Levy and Ms. Clattenburg:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. Currently before the Commission are two matters in which it appears that your client, Fusion GPS, may be able to provide relevant information. On behalf of the Commission, the Office of General Counsel requests that your client assist us with discovery in these matters by answering the following questions and producing the requested documents. Where appropriate, statements should be submitted under oath. We request that you submit your client's response within thirty (30) days from the date you receive this letter. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be substituted in lieu of the production of the originals. We further request that you produce documents and communications in an easily readable format (*i.e.*, PDF). For the purposes of these questions, "identify" and "identity" with respect to a person shall mean provide the person's full name, most recent business and residence addresses, telephone numbers, and email addresses. These discovery requests refer to the time period from January 1, 2016 to the present.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 52 U.S.C. § 30109(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

Questions and Document Requests

1. Provide all agreements, contracts, invoices, checks or other instruments of payment (including copies of canceled checks) relating to work performed for Perkins Coie LLP.
2. Provide all documents and records of communications relating to work performed for Perkins Coie LLP, including, but not limited to:
 - a. any communications to or from any other officer, employee, consultant, representative, or agent of Perkins Coie LLP, and provide the date of each communication, a description of the content of each communication, and identify the persons making and receiving the communication;
 - b. to the extent not provided in response to Question 2.a, all communications between any officer, employee, consultant, representative, or agent of HFA and any officer, employee, consultant, representative, or agent of Fusion GPS, including the date of each communication, the identity the persons making and receiving the communication, and a description of the content of each communication; and
 - c. to the extent not provided in response to Question 2.a, all communications between any officer, employee, consultant, representative, or agent of the DNC and any officer, employee, consultant, representative, or agent of Fusion GPS, including the date of each communication, the identity the persons making and receiving the communication, and a description of the content of each communication.
3. Identify any officer, employee, consultant, representative, or agent of Fusion GPS or Orbis Business Intelligence who met with:
 - a. any officer, employee, consultant, representative, or agent of Perkins Coie LLP. Identify all of the persons who attended each meeting, the location of the meeting, and a description of what was discussed at the meeting;
 - b. any officer, employee, consultant, representative, or agent of HFA. Identify all of the persons who attended each meeting, the location of the meeting, and a description of what was discussed at the meeting; and
 - c. any officer, employee, consultant, representative, or agent of the DNC. Identify all of the persons who attended each meeting, the location of the meeting, and a description of what was discussed at the meeting.
4. To the extent not provided in response to Questions 2 and 3, identify any officer, employee, consultant, representative, or agent of Perkins Coie LLP, HFA, or the DNC with whom any officer, employee, consultant, representative, or agent of

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Fusion GPS or Orbis Business Intelligence had any contact. Describe the nature of the contact (*e.g.*, oral, written, in person), identify all persons involved in each contact, provide the date of each contact, and a description of what was discussed.

5. Provide the names, telephone numbers, residential addresses, email addresses, and title of the persons providing information responsive to these questions.

If you have any questions, please contact me at (202) 694-1650 or arobinson@fec.gov.
Thank you for your cooperation.

Sincerely,

Anne B. Robinson

Anne B. Robinson
Attorney