



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 17, 2019

Carl J. Lawyer
Drake Law Firm
700 N. Washington Street
Alexandria, VA 22314

RE: MUR 7468

Dear Mr. Lawyer:

The Federal Election Commission (the "Commission") has the statutory duty to enforce the Federal Election Campaign Act of 1971, as amended. Pursuant to its investigation in the above matter, the Commission has issued the attached Subpoena requiring Matthew Tunstall to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. Mr. Tunstall's responses to the Subpoena must be submitted under oath within 30 days of receipt to the Office of General Counsel, Federal Election Commission, 1050 First Street, NE, Washington, DC 20463.

Further, Mr. Tunstall is also required to appear for a Deposition at the office of the Federal Election Commission at 10:00 a.m. on October 21, 2019, or another mutually agreeable date. To discuss any issues regarding the Subpoena or the Deposition, please contact me at (202) 694-1574 or by email at jdigiovanni@fec.gov.

Sincerely,

A handwritten signature in cursive script that reads "Justine A. di Giovanni".

Justine A. di Giovanni
Attorney

Enclosure:
Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Progressive Priorities PAC) MUR 7468
)

SUBPOENA

To: Matthew Tunstall
c/o Carl J. Lawyer
Drake Law Firm
700 N. Washington Street
Alexandria, VA 22314

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 Matthew Tunstall to appear for a deposition. Notice is hereby given that the deposition is to be taken on October 21, 2019, or another mutually agreeable date, at the office of the 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.

Further, pursuant to 52 USC § 30107(a)(3), you are hereby subpoenaed to produce the documents listed on the attachment to this subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals. The documents must be submitted to the Office of the General Counsel, Federal Election Commission, 1050 First Street, N.E., Washington, D.C. 20463, by September 30, 2019.

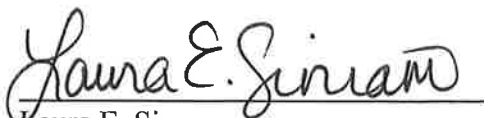
WHEREFORE, the Chair of the Federal Election Commission has hereunto set her hand in Washington D.C. on this 11th day of Sept., 2019.

On behalf of the Commission,



Ellen L. Weintraub
Chair

ATTEST:



Laura E. Sinram
Acting Secretary and Clerk of the Commission

Attachments:

- Instructions and Definitions
- Document Requests

INSTRUCTIONS

1. In answering these 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. 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.
3. Mark each page with identification and consecutive document control numbers (*i.e.*, Bates numbers).
4. Unless otherwise specified, these requests shall refer to the time period from January 1, 2016 through the present.
5. 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.
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 these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

1. "You" shall mean Matthew Tunstall.
2. "PPP" shall mean Progressive Priorities PAC and any employees, agents, and other individuals acting for or on behalf of Progressive Priorities PAC.
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.

DOCUMENT REQUESTS

1. For the time period from January 1, 2016, to the present, identify all persons who have been directors, officers, employees, representatives, or agents of PPP.
2. For the time period from January 1, 2016, to the present, produce a copy of all communications that relate to PPP, including, but not limited to, communications regarding:
 - a. PPP's formation;
 - b. PPP's fundraising and solicitations;
 - c. PPP's receipts and contributions;
 - d. PPP's expenditures and disbursements;
 - e. PPP's filings with the Federal Election Commission; and
 - f. PPP's treasurer(s).
3. Provide copies of all ledgers, spreadsheets, financial statements, bank statements, or other documents that reflect contributions to and disbursements by PPP.
4. Produce copies of all documents reflecting all contributions or donations to and disbursements by PPP.