

**FEDERAL ELECTION COMMISSION****CERTIFIED MAIL**
RETURN RECEIPT REQUESTED

July 13, 2022

Bank of America, N.A.
Legal Order Processing
P.O. Box 15047
Wilmington, Delaware 19580-5047

RE: MUR 7932

To whom it may concern:

Enclosed is a Subpoena to Produce Documents and Order to Submit Written Answers to Questions, directed to Bank of America. The Right to Financial Privacy Act of 1978 permits the customer whose records are sought 10 days from the date of receipt of the Subpoena and Order to move to quash them. Enclosed is a certificate of compliance with the Right to Financial Privacy Act of 1978, issued in connection with the enclosed Subpoena and Order seeking the financial records of Advanced Analytics, LLC and Hunter Davis Pace.

Should the documents we have requested incur production costs for the Bank, before processing please email Elena Paoli at epaoli@fec.gov a written estimate or invoice pertaining to all costs involved in the processing of this request.

Please be advised that 52 U.S.C. § 30109(a)(12) 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 case.

If you have any questions, please contact me at (202) 694-1548.

Sincerely,

Elena Paoli

Elena Paoli
Attorney

Enclosures
Subpoena and Order
Certificate

**CERTIFICATION OF COMPLIANCE WITH
THE RIGHT TO FINANCIAL PRIVACY ACT**

TO: Bank of America, N.A.
Legal Order Processing
P.O. Box 15047
Wilmington, DE 19580-5047

FROM: Federal Election Commission
1050 First Street, N.E.
Washington, D.C. 20463

RE: MUR 7932

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the Subpoena to Produce Documents and Order to Submit Written Answers enclosed herein in the above-captioned matter, responses to which are being ordered pursuant to 12 U.S.C. §§ 3402 and 3405.

Sincerely,

July 13, 2022
Date

Elena Paoli
Elena Paoli, Attorney

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Hunter Davis Pace

MUR 7932

SUBPOENA TO PRODUCE DOCUMENTS AND
ORDER TO SUBMIT WRITTEN ANSWERS

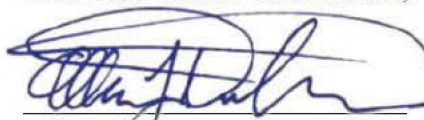
TO: Bank of America, N.A.
 Legal Order Processing
 P.O. Box 15047
 Wilmington, DE 19580-5047

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, and by email to epaoli@fec.gov and cela@fec.gov, along with the requested documents within 30 days of receipt of this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C., on this 27th day of June 2022.

On behalf of the Commission,


 Allen Dickerson
 Chairman

ATTEST:

Laura e Sinram

Digitally signed by Laura e
 Sinram
 Date: 2022.06.27 20:27:33
 -04'00'

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 individuals 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 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. Unless otherwise specified, these requests shall refer to the time period from January 1, 2019, through December 31, 2019.
8. 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.
9. 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 Bank of America and any employees, agents, and other individuals acting for or on behalf of Bank of America.
2. “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.
3. “Document” shall mean the original and all non-identical copies of all records (whether hard copy or electronic) in your possession, including but not limited to emails, text messages, messages sent via any messenger application, messages and posts on any social media platform, contracts, spreadsheets, notes or records of telephone or in-person communications, checks, financial records, reports, memoranda, correspondence, audio and video recordings, and all other records or drafts thereof from which pertinent information can be obtained
4. “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.
5. “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.
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.
7. “Communication” shall be deemed to include both singular and plural, and to include written, oral, telephonic and electronic communications.

QUESTIONS AND DOCUMENT REQUESTS

1. Regardless of when opened, for all accounts opened on behalf of Hunter Davis Pace or Advanced Analytics, LLC:

- a. identify the account number(s), the date the account(s) was opened, and the date the account(s) was closed; and
 - b. identify the person(s) who opened the account(s) and all persons authorized to access the account(s) and the funds held within, including names, addresses, phone numbers and e-mail addresses.
2. For each account identified in response to Question 1, above, identify and produce documents and records related to all transactions made from January 1, 2019 to Dec. 31, 2019, including, but not limited to:
 - a. all documents related to opening the accounts, including, but not limited to, the account application;
 - b. bank signature card or any other document(s) designating or assigning any person access to the account(s) or to the funds held within;
 - c. statements documenting transactions, also including the two most recent statements;
 - d. deposit tickets for deposits made to the account, or any record of deposits or credits made to the account;
 - e. records of all withdrawals made from the account, including copies of all cancelled checks (front and back) and other records of withdrawal;
 - f. records of all incoming and outgoing transfers of funds made to or from the account(s); and
 - g. all documents related to closing of the account(s), including but not limited to, the account closing form.