



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 3, 2019

PayPal/Venmo

Re: Grand Jury Subpoena

Please be advised that the accompanying grand jury subpoena has been issued in connection with an official criminal investigation of a suspected felony being conducted by a federal grand jury. The Government hereby requests that you voluntarily refrain from disclosing the existence of the subpoena to any third party. While you are under no obligation to comply with our request, we are requesting you not to make any disclosure in order to preserve the confidentiality of the investigation and because disclosure of the existence of this investigation might interfere with and impede the investigation.

Thank you for your cooperation in this matter.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By:

[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]

United States District Court
SOUTHERN DISTRICT OF NEW YORK

TO: PayPal/Venmo

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 220, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: September 17, 2019

Appearance Time: 10 a.m.

to testify and give evidence in regard to alleged violations of federal criminal law, including:
18 U.S.C. §§ 1591, 1594(c), 2422(b), 371

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

SEE ATTACHED RIDER. **Personal appearance is not required** if the requested records are (1) produced by on or before the return date to Forensic Accountant [REDACTED], Federal Bureau of Investigation, 26 Federal Plaza, New York, NY 10278, telephone [REDACTED] and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. **Please contact Forensic Accountant [REDACTED] or Special Agent [REDACTED] at [REDACTED] with any questions.**

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York
September 3, 2019


GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

[REDACTED]
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
[REDACTED]



RIDER

(Grand Jury Subpoena to PayPal/Venmo, dated September 3, 2019)

For the time period of account inception to the present, please provide any and all records, including but not limited to account holder information and transaction records, relating to the following email:

[REDACTED]

Account holder and transaction information to include:

- User ID History
- Name
- Phone Number
- Address
- Billing Address
- Shipping Address
- E-mail Address
- IP Address
- Transaction details
- Bank account information
- Credit card account information
- Debit card account information
- Money sent
- Money received
- Checks requested
- Venmo account information and transactions
- PayPal Credit account information and transactions
- PayPal Working Capital account information and transactions
- PayPal MyCash account information and transactions
- PayPal Cash account information and transactions
- Xoom account information and transactions
- Braintree account information and transactions

N.B.: Personal appearance is not required if the requested records are (1) produced by on or before the return date to Forensic Accountant [REDACTED] Federal Bureau of Investigation, 26 Federal Plaza, New York, NY 10278, telephone [REDACTED] and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. PLEASE PROVIDE IN NATIVE, ELECTRONIC FORMAT IF POSSIBLE.

Please contact Forensic Accountant [REDACTED] or Special Agent [REDACTED] [REDACTED] with any questions.

IMPORTANT: REQUEST FOR NON-DISCLOSURE

Due to the ongoing nature of the investigation, it is requested that you do not disclose any information relating to this Grand Jury subpoena request to any third party.

Declaration of Custodian of Records

Pursuant to 28 U.S.C. § 1746, I, the undersigned, hereby declare:

My name is _____.
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration.

I am in receipt of a Grand Jury Subpoena, dated September 3, 2019, and signed by Assistant United States Attorney [REDACTED] requesting specified records of the business named below. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records provided herewith and in response to the Subpoena:

- (1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;
- (2) were kept in the course of regularly conducted business activity; and
- (3) were made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____.
(date)

(signature of declarant)

(name and title of declarant)

(name of business)

(business address)

Definitions of terms used above:

As defined in Fed. R. Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed. R. Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.