



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*

June 16, 2020

Citibank N.A.
Legal Services Intake Unit
701 East 60th Street North
Sioux Falls, SD 57117
Fax: 347-809-6937
Attention: Legal Intake Unit

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

B ■

Assistant United States Attorney
Southern District of New York

United States District Court
SOUTHERN DISTRICT OF NEW YORK

TO: Citibank N.A.
Legal Services Intake Unit
701 East 60th Street North
Sioux Falls, SD 57117
Fax: 347-809-6937
Attention: Legal Intake Unit

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: July 9, 2020

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), 2423(a), 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 Assistant U.S. Attorney [REDACTED] at: U.S. Attorney's Office, Southern District of New York, [REDACTED], or via email at [REDACTED]; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. **PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.**

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
June 16, 2020


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


[REDACTED]

Assistant United States Attorney
[REDACTED]
[REDACTED]
[REDACTED]



RIDER

(Grand Jury Subpoena to Citibank, dated June 16, 2020)

Please provide the following information for open or closed individual, joint, or commercial accounts, or related or affiliated accounts, associated with the following account number, for the period January 1, 2005, to the present:

Account number:

- [REDACTED]

Please include in your response **related or affiliated accounts** identified by name, address, Social Security Number(s), Employer Identification Number(s), driver's license number(s), financial account number(s), corporate/d.b.a records, Tax Identification Number(s), internal investigative findings or other means, for the period January 1, 2005, to the present.

Any and all records in your care, custody, possession or control, including but not limited to:

1. Records relating to "Know Your Customer" filings, submissions, forms, requests, supplements, and questions and answers;
2. Records relating to the opening and/or closing of accounts, including account applications, signature cards, proof of identification, corporate resolutions, and related records (to be included even if dated outside the above-specified time period);
3. All account monthly or other periodic statements and/or transcripts;
4. Signature cards, and any other documents reflecting the identities of individuals authorized to conduct transactions in, or have access to, the accounts;
5. Records relating to or reflecting the names, addresses, social security numbers, and /or employer identification numbers of all account holders;
6. Loan and/or lines of credit applications and files;
7. All account deposit and withdrawal items;
8. Deposit records including deposit slips, items deposited, and all documents and records or information indicating sources of deposited funds;
9. Withdrawal and deposit records including withdrawal and deposit applications, drafts, wire transfers, and all other documents showing any record or information relating to the destination or disposition of withdrawn or wired funds;
10. Cancelled checks (both front and back);
11. Debit and credit memoranda and related documents;
12. Records of and relating to all cashier's checks, bank checks, teller checks, certified checks, money orders, traveler's checks, and/or other official checks issued to, or on behalf of, any account holder;
13. Credit card accounts;
14. Loan files, including all applications and supporting documentation, to include financial statements, credit reports, and appraisals, loan approval records, promissory notes,

mortgages, security agreements, and loan repayment records, to include any records or information relating to payment sources;

15. Safe deposit records, including applications, signature cards, and any records relating to access;
16. Currency transactions reports (IRS Forms 4789) and other required reports made to any regulatory or law enforcement authority;
17. Account opening documents to include photocopies if ID, SSN card etc.;
18. Any correspondence to, from, or relating to accounts, account-holders, or other individuals associated with accounts, including any recorded customer service telephone calls, and including correspondence with any regulatory or law enforcement authority;
19. Memoranda, notes or other records of telephone conversations associated with accounts or individuals associated with accounts (including conversations with any regulatory or law enforcement authority);
20. Internal memoranda and reports;
21. Computer records / logs of any communication or attempted communication with the customer;
22. Customer service call logs;
23. Trust accounts;
24. Any email addresses associated with the accounts/account holders;
25. Any and all corporate resolutions, certifications of incorporation, business certificates and/or partnership agreements; and
26. Any and all correspondence, electronic or otherwise, including memoranda, emails and text messages, that reference or concern items (1) through (26), above, and/or any financial interests involving the individuals and/or entities identified in Section A.

N.B.: Personal appearance is not required if the requested records are (1) produced by on or before the return date to Assistant U.S. Attorney [REDACTED] at: U.S. Attorney's Office, Southern District of New York, [REDACTED], or via email at [REDACTED]; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.

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 June 16, 2020, 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.