United States District Court
SOUTHERN DISTRICT OF NEW YORK

TO: JPMorgan Chase Bank, N.A.
National Subpoena Processing Center
Attn: Records Custodian
7610W Washington Street / INI-4054
Indianapolis, IN 46231

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: August 30, 2019 Appearance Time: 10:00 a.m.

to testify and give evidence in regard to an alleged violation of :

18 U.S.C. §§ 201, 371, 1001, 1346, 1519, 2

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:

Please see attached rider. Personal appearance is not required if the requested records are (1) produced on or before the return date to Assistant U.S. Attorney [redacted] of the United States Attorney's Office, 1 St. Andrew's Plaza, New York, NY 10007. Tel: [redacted] email: [redacted] and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. Ref No. 2019R01059.

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
August 17, 2019

Geoffrey S. Berman

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]

rev. 02.01.12

RIDER
(Grand Jury Subpoena to JPMC, dated August 17, 2019)
Ref. No. 2019R01059

REQUEST:

For the following account, and any other account controlled by the account holder of one of the below accounts:

Please provide any and all documents, to include, but not limited to those identified below, for the period **January 1, 2019 until the present**:

a. Account opening documents, including applications and signature cards;
b. Records of account holders for debit and credit cards liked to the accounts;
c. Account statements and ledgers;
d. Images of checks (both front and back) deposited in account;
e. Images of canceled checks (both front and back) drawn on account;
f. Images of cashier's checks (both front and back) and depositing bank account information;
g. Account deposit slips, withdrawal slips, debit & credit memos, and cash tickets;
h. Detailed wire transfer records, ACH transfer records (including routing/account numbers funds transferred to/from), money orders, and traveler's check records;
i. All credit card and line of credit records, including, but not limited to: applications, monthly statements, billing slips, and records evidencing the source of payment (copies of checks, ACH records (including routing/account numbers funds transferred to/from), or cash received slips);
j. Customer information associated with the account, including name(s), address(es), telephone number(s), e-mail address(es), and any other identifying or contact information.

INSTRUCTIONS FOR PRODUCTION OF DOCUMENTS:

1. All transactions-based information, include wire and ACH transfers, withdrawals/deposits, charges/payments, and bank account activity should be provided in **electronic spreadsheet format** (either Microsoft Excel or similarly compatible format). Specifically:

    a. For wires and other types of transfers, the account holder name, account number, and bank name of both the originator and beneficiary of the transaction should be clearly stated in separate fields.

    b. Cash and check transactions should be indicated within a transaction type field.

        i. Check transactions should include the name of the payee in the recipient field. Additionally, check images should be attached in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained, and named in a manner that uniquely associates them with the relevant transaction record(s).

        ii. Cash withdrawals should be indicated with CASH written in the recipient field.

iii. Cash deposits should be indicated with CASH written in the sender/originator field.

c. Field headers should be included for each column of data, and a data dictionary or other explanation of the contents of each column provided.

2. Where more than one account is being requested, each account's transaction records should be returned in a separate file.

3. All document images are to be produced in electronic PDF format. Where images of checks, deposit slips, withdrawal slips, or cash tickets are being produced, they should be produced no more than two per page.

4. In lieu of an appearance you may comply with this subpoena by providing the requested information, along with a business records certification pursuant to Fed. R. Evid. 803(6) to Assistant U.S. Attorney [redacted] of the United States Attorney's Office, 1 St. Andrew's Plaza, New York, NY 10007. Tel: [redacted], email: [redacted].

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 August 17, 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.

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

August 17, 2019

Re: Grand Jury Subpoena

This letter describes the procedure for requesting reimbursement for subpoenaed records.

12 CFR part 219 (subpart A), issued by the Board of Governors of Federal Reserve System under section 1115 of the Right to Financial Privacy Act (12 U.S.C. § 3415), sets the rates and conditions for reimbursement of costs directly incurred by financial institutions in assembling or providing customer financial records to a government authority pursuant to the Act. No costs are reimbursable if the records are those of a corporation or a partnership comprised of more than five individuals.

If reimbursement is authorized, and the estimated billing to the government will exceed $500, advance permission is necessary from Ed Tyrrell at 212-637-2269.

If the subpoenaed records indicated on the rider are eligible for reimbursement, please complete section B of the enclosed form OBD-211, which will serve as your invoice, and return it with a copy of the subpoena to the following address:

U.S. Attorney's Office - SDNY
Accounts Payable
86 Chambers Street, 3rd floor
New York, NY 10007
(212) 637-2662

Please send your invoice to the above address within 60 days of the submission of the subpoenaed records. If no invoice is received within 120 days, funds will not be available to pay the invoice.

Thank you for your cooperation in this matter.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ [redacted]
Assistant United States Attorney
[redacted]

Enclosure: OBD- 211