



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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

August 16, 2019

Wells Fargo Bank N.A.  
Attn: Legal Order Processing Department  
1090 Vermont Ave  
Washington, DC 20005

**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: Wells Fargo Bank N.A.  
Attn: Legal Order Processing Department  
1090 Vermont Ave  
Washington, DC 20005

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 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 Special Agent [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] at [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  
August 16, 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  
Telephone: [REDACTED]  
[REDACTED]



(Grand Jury Subpoena to Wells Fargo, dated August 16, 2019)

Please provide from account inception to the present any and all records pertaining to the following accounts(s)/organization(s)/individual(s), whether held jointly or severally or as trustee or fiduciary as well as custodian, executor, or guardian, to include all open and closed accounts. **Please provide all images of documents in Adobe PDF files on CDs.**

A. Please use the following identifiers:

NAMES/ENTITIES	<div>██████████</div> <div>██████████</div> <div>████████████████████</div> <div>██████████████</div> <div>██████████</div> <div>██████████████</div> <div>██████████████</div>
DOB	<div>██████████</div>
SSN	<div>██████████</div>
ADDRESS	<div>██</div> <div>██████████</div> <div>██</div> <div>██</div> <div>██</div> <div>██████████</div>
PHONE	<div>██████████████</div> <div>██████████████</div> <div>██████████████</div>
EMAIL	<div>████████████████████████████</div> <div>████████████████████████████</div>
ACCOUNT NUMBERS:	<div>██████████</div>

B. Records to be produced should include but are not limited to the items listed below:

1. Data transaction files
2. Documents (checks, debit memos, cash in tickets, wires in, wires out, etc.) reflecting additions and/or subtractions to the account and how the account balances are being satisfied on a monthly basis;
3. Signature cards;
4. Proof of identification (including but not limited to copies of identification used to open the account);

5. Opening account(s) documents with attachments, including any and all applications, internal documents generated to open account(s), and identification information or other documentation provided by Customer; and Customer's email address
6. "Know your customer" documentation;
7. Wire transfer records (incoming and outgoing, and any and all applications and instructions);
8. Safe deposit records, including applications, signature cards, and sign-in records;
9. Trust accounts;
10. Monthly statements;
11. Credit card statements;
12. Bank, travelers, or cashier checks drawn on account or purchased with an account check;
13. Prepaid debit cards, certified checks, cashiers' checks, money orders, and traveler's checks;
14. Loan, lease, and/or mortgage application files (whether granted or denied) including credit reports, applications, and payments made on loans;
15. Online banking information- All information regarding the electronic use of banking systems to include the following: username, registration IP address, online account creation date, online account status and IP logs/history, MAC addresses and online session times and duration;
16. Any and all corporate resolutions, certifications of incorporation, business certificates and/or partnership agreements; and
17. Any and all correspondence, electronic or otherwise, including memoranda, emails and text messages, that reference or concern items (1) through (16), 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 Special Agent [REDACTED], Federal Bureau of Investigation, 26 Federal Plaza, New York, NY 10278, telephone [REDACTED], [REDACTED]; and (2) accompanied by an executed copy of the attached Declaration of Custodian of Records. PLEASE PROVIDE IN ELECTRONIC FORMAT IF POSSIBLE.**

**Please contact Forensic Accountant [REDACTED] at [REDACTED] or Special Agent [REDACTED] at [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 August 16, 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.