

SUBPOENA

BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE CONGRESS OF THE UNITED STATES OF AMERICA

To The Honorable Reince Priebus, Chief of Staff
The White House

You are hereby commanded to be and appear before the
Committee on Oversight and Government Reform

of the House of Representatives of the United States at the place, date, and time specified below.

- ☒ to produce the things identified on the attached schedule touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of production: 2154 Rayburn House Office Building, Washington, DC

Date: June 2, 2017

Time: 1 pm EST

- ☐ to testify at a deposition touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: _____

Date: _____

Time: _____

- ☐ to testify at a hearing touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: _____

Date: _____

Time: _____

To any authorized staff member or the U.S. Marshals Service

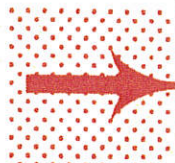
_____ to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at

the city of Washington, D.C. this _____ day of _____, 20 _____.

Attest:

**SIGN
HERE**



Chairman or Authorized Member

Clerk

SCHEDULE

In accordance with the attached schedule instructions, you, Reince Priebus, are required to produce all documents and information that are in the possession, custody or control of the Executive Office of the President, including the White House, White House Security Office, the National Security Council, and all other components, described below:

1. All documents responsive to the joint bipartisan letter to you from Chairman Jason Chaffetz and Ranking Member Elijah Cummings, dated March 22, 2017, regarding Lt. General Michael Flynn;
2. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to President Donald Trump's decision to fire then-Director of the FBI James B. Comey;
3. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to any communications between President Donald Trump and then Director of the FBI James B. Comey from January 20, 2017, to present;
4. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to any communications between President Donald Trump and Attorney General Jeff Sessions from January 20, 2017, to present regarding the Attorney General's recusal, the firing of the Director of the FBI, or any counterintelligence, criminal or congressional investigation involving Russia, the 2016 presidential election, or any individuals within the Trump campaign or the Clinton campaign;
5. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to whether Attorney General Jeff Sessions violated his public promises to recuse himself, including any memoranda by the White House Counsel's Office or the Department of Justice's Office of Legal Counsel;
6. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to any actions or proposed actions to be taken by White House employees regarding law enforcement, intelligence, or Congressional investigations of contacts between Trump campaign officials and Russian persons;
7. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to the President's meeting with Russian officials in the Oval Office on May 10, 2017, including any transcripts, summaries, audio or visual recordings, or notes of the meeting itself as well as any transcripts, audio or visual recordings, communications, or notes reflecting the scheduling of, preparation for, and actions taken following the meeting, including communications about whether classified information was discussed at the meeting or regarding restricting access to documents about the meeting;

8. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to Lt. General Flynn's contacts, relationship with, and communications with foreign persons, including any reference to his payments from foreign persons, the content of his communications with those foreign persons, and the content and timing of what he told others in the White House about his communications with foreign persons; and
9. All documents, communications, notes, audio and visual recordings, transcripts, and memoranda referring or relating to any communications between President Donald Trump and Lt. General Michael Flynn from February 13, 2017, to present.

Schedule Instructions

1. In complying with this subpoena, you are required to produce all responsive documents that are in the possession, custody, or control of the White House, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. Subpoenaed records, documents, data or information should not be destroyed, modified, removed, transferred or otherwise made inaccessible to the Committee.
2. In the event that any entity, organization or individual denoted in this subpoena has been, or is also known by any other name than that herein denoted, the subpoena shall be read also to include that alternative identification.
3. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, or thumb drive) in lieu of paper productions.
4. Documents produced in electronic format should also be organized, identified, and indexed electronically.
5. Electronic document productions should be prepared according to the following standards:
 - (a) The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
 - (b) Document numbers in the load file should match document Bates numbers and TIF file names.
 - (c) If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
6. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, box or folder is produced, each CD, hard drive, memory stick, thumb drive, box or folder should contain an index describing its contents.
7. Documents produced in response to this subpoena shall be produced together with copies of file labels, dividers or identifying markers with which they were associated when the subpoena was served.
8. When you produce documents, you should identify the paragraph in the Committee's schedule to which the documents respond.
9. It shall not be a basis for refusal to produce documents that any other person or entity also possesses non-identical or identical copies of the same documents.

10. If any of the subpoenaed information is only reasonably available in machine-readable form (such as on a computer server, hard drive, or computer backup tape), you should consult with the Committee staff to determine the appropriate format in which to produce the information.
11. If compliance with the subpoena cannot be made in full by June 2, 2017, at 1:00 p.m., compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided no later than June 2, 2017 at 1:00 p.m..
12. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.
13. Any objections or privileges are waived if you fail to provide an explanation of why full compliance is not possible and a privilege log prior to the subpoena compliance date.
14. In complying with the subpoena, be apprised that the U.S. House of Representatives and the Committee do not recognize: any purported non-disclosure privileges associated with the common law including, but not limited to, the deliberative process privilege, the attorney-client privilege, and attorney work product protections; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.
15. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject and recipients) and explain the circumstances under which the document ceased to be in your possession, custody, or control.
16. If a date or other descriptive detail set forth in this subpoena referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the subpoena, you are required to produce all documents which would be responsive as if the date or other descriptive detail were correct.
17. Unless otherwise specified, the time period covered by this subpoena is November 8, 2016 to May 21, 2017.
18. This subpoena is continuing in nature and applies to any newly-discovered information as to the time period November 8, 2016 to May 21, 2017. Any responsive record, document, compilation of data or information, not produced because it has not been located or discovered by the return date, shall be produced immediately upon subsequent location or discovery.
19. All documents shall be Bates-stamped sequentially and produced sequentially.
20. Two sets of documents shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2471 of the Rayburn House Office Building.

21. Upon completion of the document production, you should submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

Schedule Definitions

1. The term “document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, inter-office and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and audio, video, electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, email (desktop or mobile device), text message, instant message, MMS or SMS message, regular mail, telexes, releases, or otherwise.
3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this subpoena any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
4. The terms “person” or “persons” mean natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, or other units thereof.

5. The term "referring or relating," with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is pertinent to that subject in any manner whatsoever.
6. The term "employee" means agent, borrowed employee, casual employee, consultant, de facto employee, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, or any other type of service provider.