



June 20, 2019

Federal Election Commission
Lisa J. Stevenson, Acting General Counsel
Office of the General Counsel
1050 First Street, NE
Washington, DC 20463

RE: Additional Facts Relevant to MUR #7442

Dear Ms. Stevenson:

The Campaign Legal Center (“CLC”) writes to supplement our July 25, 2018 complaint (assigned MUR #7442) against Global Energy Producers, LLC (“GEP”), Igor Fruman, Lev Parnas, and any person(s) who created, operated, and/or made contributions to or in the name of GEP (John Doe, Jane Doe, and other persons), and to add two additional respondents: America First Action, Inc. (I.D.: C00637512), and Aaron Investments I, LLC.

CLC’s original complaint detailed available facts establishing reason to believe that Fruman, Parnas, and any other person(s) who created, operated, and/or contributed to GEP violated 52 U.S.C. § 30122 by making a \$325,000 contribution to America First Action, a pro-Trump super PAC, in the name of another person, namely GEP, and that GEP violated 52 U.S.C. § 30122 by knowingly permitting its name to be used for the making of such contribution.

As detailed in CLC’s original complaint, GEP was formed on April 11, 2018, and according to America First Action’s reports filed with the Federal Election Commission, made a \$325,000 contribution just weeks later, on May 17, 2018. Available records provide no indication that GEP had accrued sufficient assets, investment earnings, business revenues, or bona fide capital investments to make the contribution without an infusion of funds provided to it for that purpose. Indeed,

GEP only began taking bids to design a low-cost website *after* it made the \$325,000 contribution, and still does not appear to have published the website.

Newly available records, made public through a civil action against Mr. Parnas in the U.S. District Court for the Southern District of Florida, establish that GEP was not, in fact, the source of the \$325,000 contribution, and raise further questions about the true source of the funds. These records additionally establish that America First Action knowingly accepted a contribution in the name of another, violated its reporting obligations, and filed a falsified report with the Commission.

According to these records, on May 15, 2018, a real estate attorney—who specializes in navigating rules for foreign buyers using shell companies to launder money through U.S. real estate—transferred \$1.26 million from a client trust account to an LLC managed by Mr. Parnas and his wife. Two days later, that LLC contributed \$325,000 to America First Action via a wire transfer. America First Action then falsely attributed that contribution to “Global Energy Producers, LLC” on its report filed with the Commission.

Specifically, wire transfer records show that on May 17, 2018, an entity managed by Mr. Parnas and his wife called Aaron Investments I, LLC, at the address 21842 Cypress Palm Ct. in Boca Raton, Florida, transferred \$325,000 to America First Action.¹

¹ Exhibit A at 7 (showing a \$325,000 wire transfer dated May 17, 2018 from Aaron Investments I, LLC to America First Action, Inc.). Florida corporation records show Lev and Svetlana Parnas listed as the sole individuals currently associated with Aaron Investments I, LLC, which registered on May 18, 2015. *Detail by Entity Name: Aaron Investments I, LLC*, Florida Division of Corporations, <http://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&irectionType=Initial&searchNameOrder=AARONINVESTMENTS%20L150000877200&aggregateId=flal-115000087720-9a128e98-8da2-4e6b-9a8b-a91ca8b6ebf5&searchTerm=aaron%20investments&listNameOrder=AARONINVESTMENTS%20L070000369710> (last visited June 18, 2019). Specifically, Lev Parnas is designated a “manager” and an “authorized representative,” and Svetlana Parnas is designated the “registered agent,” an “authorized person,” and an “authorized member” for Aaron Investments I, LLC. *Id.*; see also *Division FAQs*, Florida Division of Corporations, <https://dos.myflorida.com/sunbiz/about-us/faqs/> (last visited June 19, 2019) (explaining, in the answers to question 9 and 29, that an LLC’s “manager . . . perform[s] the management function on behalf of the company,” that an authorized representative can “execute and file records with the Division of Corporations,” and that a “registered agent” “accept[s] service of process on behalf of a business entity”). Under Florida law, “A person may become a member without acquiring a transferable interest and without making or being obligated to make a contribution to the limited liability company,” FL ST § 605.0401, and “[a] member or manager is not personally liable, directly or indirectly, by way of contribution or otherwise, for a debt, obligation, or other liability of the company solely by reason of being or acting as a member or manager.” FL ST § 605.0304.

America First Action did not disclose receiving \$325,000 from Aaron Investments I, LLC on its July quarterly report, nor has it ever reported a contribution from this entity.² Instead, America First Action reported that the source of the \$325,000 contribution dated May 17, 2018 was GEP, from the address, “7670 La Cornich[e] Circle,” in Boca Raton, Florida.³

Notably, although the Aaron Investments I, LLC wire transfer included the notation “Global Energy Producers LLC,”⁴ the transfer record did not include the address that ultimately appeared in the contribution entry on America First Action’s July quarterly report, which suggests that America First Action had additional correspondence with Mr. Parnas or others about how to falsely attribute this contribution to GEP.

Given this evidence, GEP clearly was not the source of the \$325,000 contribution, much less the true source of the underlying funds. Other wire transfer records suggest that Aaron Investments I, LLC was not the true source of the contribution, either.

Two days before making the contribution to America First Action, Aaron Investments I, LLC received a \$1,260,329.80 wire transfer from a Miami real estate attorney named Russell S. Jacobs.⁵

Available records suggest that Aaron Investments I, LLC did not have sufficient assets to make the \$325,000 contribution until receiving the funds transferred by Mr. Jacobs. In the year prior to Mr. Jacobs’ transfer—between May 30, 2017 and May 15, 2018—Aaron Investments I, LLC received only \$56,800 in incoming wire transfers.⁶ Nor does there appear to be public evidence that would suggest Aaron Investments I, LLC conducted sufficient business activity to fund a \$325,000 contribution: It appears to have neither a website nor a presence on social media, it is not registered with the Better Business Bureau,⁷ it does not appear in Securities

² America First Action, Inc., Receipts from “Aaron Investments,” 2017-18, FEC.GOV, https://www.fec.gov/data/receipts/?two_year_transaction_period=2018&data_type=processed&committee_id=C00637512&contributor_name=aaron+investments&min_date=01%2F01%2F2017&max_date=12%2F31%2F2018 (last visited June 18, 2019) (showing no reported contributions from Aaron Investments); *see also* America First Action, Inc., Receipts from “Aaron Investments,” 2019-20, FEC.GOV, https://www.fec.gov/data/receipts/?two_year_transaction_period=2020&data_type=processed&committee_id=C00637512&contributor_name=aaron+investments&min_date=01%2F01%2F2019&max_date=12%2F31%2F2020 (last visited June 18, 2019) (also showing no reported contributions from Aaron Investments).

³ America First Action, Inc., 2018 July Quarterly, FEC Form 3X, at 15 (filed July 15, 2018), <http://docquery.fec.gov/pdf/113/201807159115673113/201807159115673113.pdf>.

⁴ *See* Exhibit A at 7.

⁵ Exhibit B at 6.

⁶ *Id.*

⁷ *See* Search results for “Aaron Investments near Boca Raton, FL,” BETTER BUSINESS BUREAU, https://www.bbb.org/search?find_country=USA&find_latlng=26.369124%2C-

and Exchange Commission records,⁸ and it does not otherwise show any discernible form of a public presence.

Wire transfer records suggest at least one further layer to this long chain of shell transfers: Mr. Jacobs' wire transfer was described as coming from "Russell S. Jacobs P.A. IOTA account[t]."⁹ An IOTA, or an "interest on trust account," is a form of a client trust account in which an attorney maintains "nominal or short-term funds" from "a client or third person."¹⁰ As the Ethics Department of the Florida Bar explains, an IOTA account is subject to strict restrictions on any comingling of the funds of the attorney himself, who is allowed only to "maintain funds belonging to the lawyer in the trust account in an amount no more than is reasonably sufficient to pay bank charges relating to the trust account."¹¹ Therefore, it appears that the \$1.26 million transfer from the "Russell S. Jacobs P.A. IOTA account[t]" originated from a source other than Mr. Jacobs himself—namely, a client or other third party associated with Mr. Jacobs.

Little information about Mr. Jacobs' clients is publicly available. Mr. Jacobs' practice appears to include working with foreign real estate buyers and advising realtors on how to avoid federal requirements aimed at disclosure of foreign buyers who use shell companies to launder money through U.S. real estate.¹²

[80.146505&find_loc=Boca%20Raton%2C%20FL&find_text=aaron%20investments&page=1](https://www.sec.gov/edgar/searchedgar/companysearch.html) (last visited June 18, 2019).

⁸ See Search results for "Aaron Investments," EDGAR Company Filings, SECURITIES AND EXCHANGE COMM'N, <https://www.sec.gov/edgar/searchedgar/companysearch.html> (last visited June 18, 2019).

⁹ Exhibit B at 6.

¹⁰ Ethics Department of the Florida Bar, *Commonly Asked Questions About Trust Accounts*, THE FLORIDA BAR NEWS (Sept. 1, 2010), <https://www.floridabar.org/the-florida-bar-news/commonly-asked-questions-about-trust-accounts/>; see generally 2018 Florida Court Order 0006 (C.O. 0006); Carole J. Buckner, IOLTAs and Client Trust Accounts, American Bar Association (Apr. 3, 2019), https://www.americanbar.org/groups/gpsolo/publications/gp_solo/2011/july_august/ioltas_client_trust_accounts/

(explaining, "As a general rule, client trust accounts hold client funds or property. Whenever a lawyer holds client funds, the lawyer is acting as a fiduciary with regard to those funds.").

¹¹ *Id.*

¹² Sean Stewart-Muniz, *Does the new FinCEN regulation affect you?*, THE REAL DEAL (Mar. 2, 2016), <https://therealdeal.com/miami/2016/03/02/want-to-get-around-the-fincen-rules-theres-a-class-for-that/> (reporting on a seminar Jacobs organized titled "Avoid the Treasury Trap with Foreign Buyers" on FinCEN rules that "require title insurance companies to disclose the names of buyers behind anonymous companies that pay cash for \$1 million-and-up homes in Miami, and \$3 million-and-up in Manhattan for the next six months. It's an effort by the federal government to better curtail money laundering through high-end U.S. real estate in both markets."); see also Beckie Strum, *Miami, New York Log Highest Rates of Suspicious Luxury Real Estate Buys*, MANSION GLOBAL (May 19, 2017), <https://www.mansionglobal.com/articles/miami-new-york-log-highest-rates-of-suspicious-luxury-real-estate-buys-63251> (reporting on the success of the FinCEN rules in rooting out foreign money laundered through real estate, but noting that "Miami real estate attorney Russell Jacobs said he doesn't support the government collecting data on perfectly legal homebuyers who

Taken together, the available evidence suggests an elaborate series of deliberate transfers whose precise starting point is still unknown: An unidentified client established an attorney trust account with Mr. Jacobs, who then made a \$1.26 million transfer from that account to the apparently asset-poor Aaron Investments I, LLC, which two days later contributed \$325,000 to America First Action, which in turn ultimately—and falsely—attributed that contribution to “Global Energy Producers, LLC.”

These facts provide reason to believe that Aaron Investments I, LLC violated 52 U.S.C. § 30122 by “[m]aking a contribution of money . . . and attributing as the source of the money . . . another person [*i.e.*, GEP] when in fact [Aaron Investments I, LLC, or the persons who directly or indirectly contributed to it was] the source.” 11 C.F.R. § 110.4(b)(2)(ii).

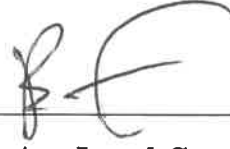
These facts additionally provide reason to believe that Igor Fruman, Lev Parnas, and any other persons who directly or indirectly contributed to Aaron Investments I, LLC, including via Jacobs’ client trust account, may have violated 52 U.S.C. § 30122 by “[m]aking a contribution of money . . . and attributing as the source of the money . . . another person [namely, GEP] when in fact [Aaron Investments I, LLC, or the persons who directly or indirectly contributed to it was] the source.” 11 C.F.R. § 110.4(b)(2)(ii).

These facts also provide reason to believe that America First Action violated 52 U.S.C. § 30122 by “knowingly accept[ing] a contribution made by one person [namely, Aaron Investments I, LLC] in the name of another person [GEP].” 11 C.F.R. § 110.4(b)(1)(iv). Although it is unclear whether America First Action was aware of the original source of the \$325,000 contribution at the time it received it, the attached records demonstrate that the super PAC accepted a contribution made via wire transfer from Aaron Investments I, LLC, and knowingly—and falsely—attributed the contribution to another person, GEP, apparently following further conversations with Mr. Parnas or others about which address to use on its report.

Finally, America First Action’s false reports provide reason to believe that the super PAC violated FECA’s reporting requirements by failing to accurately disclose the identity and address of a contributor over \$200, 52 U.S.C. § 30104(b)(3)(A), 11 C.F.R. § 104.3(a)(4)(i), and violated its obligation to file complete and accurate reports with the Commission, 52 U.S.C. § 30104, 11 C.F.R. § 104.14(d).

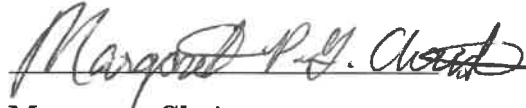
want the privacy a shell company affords. Mr. Jacobs has even conducted seminars with real estate professionals on how to structure deals to avoid the disclosure.”).

Respectfully submitted,



Campaign Legal Center, by

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Counsel to the Campaign Legal Center,
Margaret Christ

June 20, 2019

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Margaret Christ

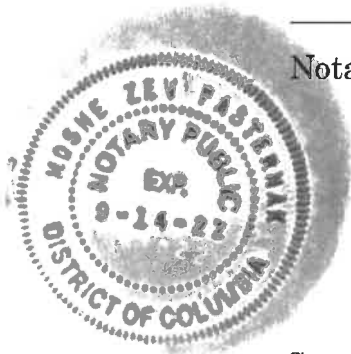


Margaret Christ

Sworn to and subscribed before me this 19 day of June 2019.



Notary Public



For Complainant Campaign Legal Center



Brendan M. Fischer

Sworn to and subscribed before me this 19 day of June 2019.



Notary Public



EXHIBIT A

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Pues Family Trust IRA, Michael Pues Executor

Plaintiff

v.

Parnas Holdings, Inc., and Lev Parnas

Defendant

Civil Action No. 19-80024-DMM

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: America First Action, Inc. By and through its Records Custodian by service of its R/A Cogency Global, Inc. 250 Browns Hill Court, Midlothian VA 23114 (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached Exhibit A

Table with 2 columns: Place (Andre Law Firm P.A., 18851 N.E. 29th Ave Suite 724, Aventura, FL 33180) and Date and Time (July 24, 2019 at 9:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time (empty)

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

/s/ Tony Andre

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Pues Family Trust IRA, Michael Pues Executor, who issues or requests this subpoena, are:

Tony Andre, Esq., 18851 N.E. 29th Ave Suite 724 Aventura, FL 33180; 7867080813; info@andrelaw.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 19-80024-DMM

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Exhibit A

Definitions

As used in this request, the following words shall be defined as follows:

1) “Document” includes, but is not limited to, originals where available, or otherwise a carbon copy, Xerox copy or other copy, including each non-identical copy (whether different from the original because of marginal notes, or other material inserted or attached thereto, or otherwise) of each item of correspondence, letters, memoranda, messages, telephone bills, notes, offers, orders, confirmations, contracts, agreements, reports, punch sheets, punch lists, agendas, cables, telegrams, diaries, appointment books, invoices, ledgers, returns, accounts, checks, check stubs, drafts, statements, indexes, data sheets, data processing cards, logs, worksheets, service orders, expense vouchers, maintenance records, inspection reports, licenses, permits, settlement paperwork, printing, pictures, advertisements, slides, film, microfilm, micro fiche and other written matter of every kind and character; notes, memoranda, transcripts, recording tapes, recording disks or other records of oral communications; and graphs, books, charts, tables, prospectuses, tabulations, worksheets, compilations, summaries, minutes, lists, pamphlets, brochures, drawings, renderings, diagrams, sketches, etchings, tracings, plans, blueprints, posters, periodicals, publications, bulletins, computer printouts, studies, electronic mail, information contained in electronic or computer storage media and other papers in the possession, custody or control of America First Action, Inc. (“Deponent”) or its officers, directors, agents, employees, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, including documents which were prepared by Deponent’s officers, directors, agents, employees, affiliates,

subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, which did not leave the custody of the person preparing them.

2) “You” or “Your” refers to Deponent, its officers, directors, agents, attorneys, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, employees, representatives and any and all other persons acting for, purporting to act for, or subject to the control of Deponent, or its subsidiaries, parents, predecessors or successors.

3) “And” or “Or” shall include the conjunctive as well as the disjunctive.

4) “Communications” include correspondence, discussions, telephone conversations and all other forms of written or oral communication.

5) “Judgment debtor” refers to any of the following:

a) Parnas Holdings, Inc., FEIN: 27-3907290; and/or

b) Lev Parnas, an individual, last known address: 7670 La Corniche

Circle Boca Raton, FL 33433.

Schedule of Documents to be Produced

Any and all documents in your possession, custody or control that relate or reflect or refer to:

1. The wire transfer/contribution from Aaron Investments I, LLC and You, which purports to transfer \$325,000.00 from Aaron Investments I, LLC to You on May 17, 2018 (See redacted wire transfer information attached as Exhibit 1).

2. Any and all documentation, including correspondence, related to the attached wire that explains why You reported to the federal authorities the source of the funds wired were from third party Global Energy Producers, LLC (See attached Exhibit 2) and not Aaron Investments I, LLC the apparent source of the funds.

3. Correspondence between You and Judgment Debtor or his agents, or correspondence concerning Judgment Debtor or his agents related to business dealings with You, including but not limited to the subject \$325,000.00 contribution evidenced here.

Wires Outgoing

SENT ORIGINATOR BENEFICIARY TD BANK, NA
 05/11/18 10:44AM SVETLANA M PARNAS Victor Imber ABA SET UP
 21842 CYPRESS PALM CT 5778 NW 23rd Way 10:44AM BOCA RATON FL
 33428 Boca Raton, FL, 33496 West Palm Beach FL \$3,556.75
 PHONE 009145314382 B&P CHECKING ACCT# SET UP BY
 SVETLANA M PARNAS APPROVED BY DA USER SVETLANA M PARNAS \$0.00 FEE
 20180511B1Q8021C017618 FED # G0181312862501 GLOBAL ID

SENT ORIGINATOR BENEFICIARY JP MORGAN
 CHASE BANK NA 05/16/18 11:48AM AARON INVESTMENTS I, LLC FD IMPORT AND EXPORT
 CORP ABA SET UP 05/16/18 21842 CYPRESS PALM CT 520 WHITE PLAINS
 RD STE 500 09:55AM BOCA RATON FL 33428 TARRYTOWN NY
 10591 NY \$490,000.00 PHONE 914-467-
 7877 009145314382 B&P CHECKING ACCT# SET UP BY
 WATSON,MONET APPROVED BY GONZALEZ,ADA JARAMILLO-
 BO \$0.00 FEE 0659470659480364401114 FED # G0181362929901 GLOBAL ID

SENT ORIGINATOR BENEFICIARY WELLS FARGO
 05/17/18 02:25PM AARON INVESTMENTS I, LLC JETSMARTER INC ABA
 SET UP 05/17/18 21842 CYPRESS PALM CT 500 EAST BROWARD BLVD STE 1900
 01:56PM BOCA RATON FL 33428 FT LAUDERALE FL 33394 CA
 \$12,950.00 PHONE 954-315-0050 009145314382
 B&P CHECKING ACCT# SET UP BY WATSON,MONET
 APPROVED BY PERSAUD,NATERAM \$0.00 FEE INVOICE # 4184
 20180517B1Q8021C027208 FED # G0181373374901 GLOBAL ID

SENT ORIGINATOR BENEFICIARY CHAIN BRIDGE
 BANK, NA 05/17/18 02:39PM AARON INVESTMENTS I, LLC AMERICA FIRST ACTION, INC.
 ABA SET UP 05/17/18 21842 CYPRESS PALM CT 138 CONANT ST 2ND FLOOR
 01:47PM BOCA RATON FL 33428 BEVERLY MA 01915 VA
 \$325,000.00 PHONE 914-774-6856 009145314382
 B&P CHECKING ACCT# SET UP BY WATSON,MONET
 APPROVED BY PERSAUD,NATERAM PALAJ,ARISTI \$0.00
 FEE GLOBAL ENERGY PRODUCERS LLC 20180517B1Q8021C027774 FED #
 G0181373420401 GLOBAL ID

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: (check only one)	PAGE 15 OF 100
<input checked="" type="checkbox"/>	11a	<input type="checkbox"/>	11b
<input type="checkbox"/>	13	<input type="checkbox"/>	11c
<input type="checkbox"/>		<input type="checkbox"/>	12
<input type="checkbox"/>		<input type="checkbox"/>	15
<input type="checkbox"/>		<input type="checkbox"/>	16
<input type="checkbox"/>		<input type="checkbox"/>	17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
AMERICA FIRST ACTION, INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
A. GLOBAL ENERGY PRODUCERS, LLC

Mailing Address **7670 LA CORNICH CIRCLE**

City BOCA RATON	State FL	Zip Code 33433
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FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual)	Occupation (for Individual)
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Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
325000.00

Date of Receipt
05 / 17 / 2018

Transaction ID : SA11AI.21241

Amount of Each Receipt this Period
325000.00

Memo Item

B.

[REDACTED]

[REDACTED]

City	State	Zip Code
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FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual)	Occupation (for Individual)
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Receipt For:
 Primary General
 Other (specify) ▼

Aggregate Year-to-Date ▼
100000.00

Date of Receipt
06 / 22 / 2018

Transaction ID : SA11AI.23666

Amount of Each Receipt this Period
100000.00

Memo Item

C.

[REDACTED]

[REDACTED]

City	State	Zip Code
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FEC ID number of contributing federal political committee. **C**

Name of Employer (for Individual)	Occupation (for Individual)
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Receipt For:
 Primary General
 Other (specify)

Aggregate Year-to-Date ▼
50000.00

Date of Receipt
06 / 22 / 2018

Transaction ID : SA11AI.23662

Amount of Each Receipt this Period
50000.00

Memo Item

SUBTOTAL of Receipts This Page (optional).....	475000.00
TOTAL This Period (last page this line number only).....	

EXHIBIT B

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Pues Family Trust IRA, Michael Pues Executor

Plaintiff

v.

Parnas Holdings, Inc., and Lev Parnas

Defendant

Civil Action No. 19-80024-DMM

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Russell S. Jacobs, P.A. (DBA Jacobs Law Group) by and through its Records Custodian By Serving its Registered Agent The Jacobs Law Group 20700 West Dixie Highway Aventura FL 33180 (Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached Exhibit A

Table with 2 columns: Place (Andre Law Firm P.A., 18851 N.E. 29th Ave Suite 724 Aventura, FL 33180) and Date and Time (July 24, 2019 at 9:00 am)

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Table with 2 columns: Place and Date and Time (empty)

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

/s/ Tony Andre

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Pues Family Trust IRA, Michael Pues Executor, who issues or requests this subpoena, are:

Tony Andre, Esq., 18851 N.E. 29th Ave Suite 724 Aventura, FL 33180; 7867080813; info@andrelaw.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 19-80024-DMM

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

_____ *Printed name and title*

_____ *Server's address*

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Exhibit A

Definitions

As used in this request, the following words shall be defined as follows:

1) “Document” includes, but is not limited to, originals where available, or otherwise a carbon copy, Xerox copy or other copy, including each non-identical copy (whether different from the original because of marginal notes, or other material inserted or attached thereto, or otherwise) of each item of correspondence, letters, memoranda, messages, telephone bills, notes, offers, orders, confirmations, contracts, agreements, reports, punch sheets, punch lists, agendas, cables, telegrams, diaries, appointment books, invoices, ledgers, returns, accounts, checks, check stubs, drafts, statements, indexes, data sheets, data processing cards, logs, worksheets, service orders, expense vouchers, maintenance records, inspection reports, licenses, permits, settlement paperwork, printing, pictures, advertisements, slides, film, microfilm, micro fiche and other written matter of every kind and character; notes, memoranda, transcripts, recording tapes, recording disks or other records of oral communications; and graphs, books, charts, tables, prospectuses, tabulations, worksheets, compilations, summaries, minutes, lists, pamphlets, brochures, drawings, renderings, diagrams, sketches, etchings, tracings, plans, blueprints, posters, periodicals, publications, bulletins, computer printouts, studies, electronic mail, information contained in electronic or computer storage media and other papers in the possession, custody or control of Russell S. Jacobs, P.A. d/b/a or a/k/a The Jacobs Law Group (“Deponent”) or its officers, directors, agents, employees, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, including documents which were prepared by Deponent’s officers,

directors, agents, employees, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, which did not leave the custody of the person preparing them.

2) “You” or “Your” refers to Deponent, its officers, directors, agents, attorneys, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, employees, representatives and any and all other persons acting for, purporting to act for, or subject to the control of Deponent, or its subsidiaries, parents, predecessors or successors.

3) “And” or “Or” shall include the conjunctive as well as the disjunctive.

4) “Communications” include correspondence, discussions, telephone conversations and all other forms of written or oral communication.

5) “Judgment debtor” refers to any of the following:

a) Parnas Holdings, Inc., FEIN: 27-3907290; and/or

b) Lev Parnas, an individual, last known address: 7670 La Corniche

Circle Boca Raton, FL 33433.

Schedule of Documents to be Produced

Any and all documents in your possession, custody or control that relate or reflect or refer to:

1. The wire transfer to Aaron Investments I, LLC made by you on or about May 15, 2018. See attached redacted wire transfer advice.

- WIRI

3:53:48 PM

Wires Incoming

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 05/30/17 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 05/30/17 AMOUNT: 30,000.00 SENDING BANK:
WELLS FARGO BANK N A FEE: 0.00 SOFT ORIGINATOR: KYRYLO
BAYEV WAIVED: NO GLOBAL REF #: F01715009BC301 OTHER REF #:
2017053011B7031R02019220170530B1Q8021R03987510001 05/30/17 INCOMING MONEY TRANSFER
INFORMATION PAGE: 894

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 12/18/17 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 12/18/17 AMOUNT: 10,000.00 SENDING BANK:
BANKUNITED FEE: 0.00 SOFT ORIGINATOR: WEHOLD LLC
WAIVED: NO GLOBAL REF #: F01735201B5C01 OTHER REF #:
20171218F7B74M2C00001420171218B1Q8021R0070041000

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 01/12/18 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 01/12/18 AMOUNT: 3,000.00 SENDING BANK:
WELLS FARGO BANK N A FEE: 0.00 SOFT ORIGINATOR: AARON G
PARNAS WAIVED: NO GLOBAL REF #: F018012035C001 OTHER REF #:
2018011211B7033R00632220180112B1Q8021R0137601000

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 01/23/18 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 01/23/18 AMOUNT: 2,000.00 SENDING BANK:
WELLS FARGO BANK N A FEE: 0.00 SOFT ORIGINATOR: AARON G
PARNAS WAIVED: NO GLOBAL REF #: F0180230613501 OTHER REF #:
2018012311B7031R01342320180123B1Q8021R0248851000

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 01/30/18 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 01/30/18 AMOUNT: 300.00 SENDING BANK:
WELLS FARGO BANK N A FEE: 0.00 SOFT ORIGINATOR: AARON G
PARNAS WAIVED: NO GLOBAL REF #: F01803000D7101 OTHER REF #:
2018013011B7031R00015420180130B1Q8021R0034411000

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 05/10/18 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 05/10/18 AMOUNT: 11,500.00 SENDING BANK:
JPMORGAN CHASE BANK FEE: 0.00 SOFT ORIGINATOR: F D IMPORT & EXPORT
CORP WAIVED: NO GLOBAL REF #: F01813005C1001 OTHER REF #:
20180510B1QGC04C00468720180510B1Q8021R0235681000

FC: 00037 ACCOUNT: [REDACTED] RECEIVED: 05/15/18 BENEFICIARY: AARON
INVESTMENTS I, LLC POSTED: 05/15/18 AMOUNT: 1,260,329.80 SENDING BANK:
CITIBANK FLORIDA FEE: 0.00 SOFT ORIGINATOR: RUSSELL S. JACOBS P.A. IOTA
ACCOUN WAIVED: NO GLOBAL REF #: G0181354215201 OTHER REF #: 100 BANK TO
BANK INFO: RUSSELL S JACOBS P A IOTA ACCOUNT DBA THE JACOBS LAW GROUPATTO RNEY
TR UST