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# United States Senate

COMMITTEE ON THE JUDICIARY

WASHINGTON, DC 20510-6275

KOLAN L. DAVIS, *Chief Counsel and Staff Director*  
JENNIFER DUCK, *Democratic Staff Director*

October 27, 2017

Custodian of Records  
Cambridge Analytica  
1901 Pennsylvania Avenue NW  
Suite 902  
Washington, DC 20006

Dear Custodian of Records:

In July, the Committee sent out requests for information related to its investigation into the removal of FBI Director James Comey, allegations of improper influence in law enforcement investigations, and Russian interference in the 2016 election.

In its January 6, 2017 assessment, the Intelligence Community noted Russia's use of social media as part of its interference campaign to influence the 2016 election. More recently, additional questions have emerged regarding the role that targeted messaging – the identification of voters or potential voters in certain key voting districts – may have played in Russia's influence campaign. It was also recently reported that Cambridge Analytica may have sought information directly from Julian Assange, founder of Wikileaks – one of the entities responsible for distributing materials obtained as the result of cyberattacks on the computer systems of the Democratic National Committee and Clinton campaign chairman John Podesta. As part of this Committee's oversight and investigation responsibilities, I therefore request the production of the following information and documents no later than November 6, 2017:

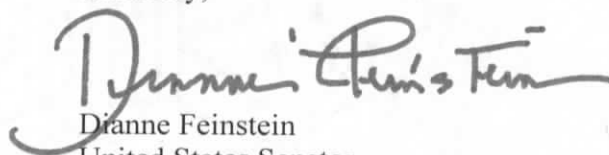
1. All communications concerning efforts by Russian government officials, associates, or representatives or any individuals who purported to act or whom you believed to be acting on behalf of Russian government officials, associates, or representatives to identify voters or potential voters for targeted advertising, marketing, or social media contact in support of the Trump campaign or other efforts to elect Donald J. Trump as president of the United States.
2. All communications with Russian government officials, associates, or representatives or any individuals who purported to act or whom you believed to be acting on behalf of Russian government officials, associates, or representatives, concerning the 2016 U.S. presidential campaign.
3. All documents concerning Russian interference in the 2016 U.S. presidential campaign.

4. All documents concerning any effort to obtain, disclose, or disseminate “hacked” emails or other electronic data belonging to or housed on the servers of the Democratic National Committee (DNC), John Podesta, Hillary Clinton, or the 2016 U.S. presidential campaign of Hillary Clinton by WikiLeaks or any other media, news leaks, or hacking organization (e.g., Guccifer 2.0, DCLeaks).
5. All communications with the Trump campaign or its representatives concerning efforts to identify voters or potential voters for targeted advertising, marketing, or social media contact in support of the Trump campaign or other efforts to elect Donald J. Trump as president of the United States.
6. All communications with each of the following persons: Donald J. Trump, Donald J. Trump, Jr., Eric Trump, Jared Kushner, Rhona Graff, Roger Stone, Paul Manafort, Steve Bannon, Lt. Gen. Michael T. Flynn, Corey Lewandowski, Dan Scavino, Carter Page, Michael Cohen, Hope Hicks, Melissa Nathan, Amanda Miller, Tim Unes, Auria McAlicher, Sam Clovis, Jeffrey “J.D.” Gordon, Jason Greenblatt, Michael Caputo, George Papadopoulos, Rick Clay, Alexander Torshin, Maria Butina, Johnny Yenason, Bob Forseman, Curt Weldon, Paul Erickson, Ivan Timovfee, Peter W. Smith, or Julian Assange.
7. Documents sufficient to describe your document retention policy.

Instructions and definitions are included in Attachment A.

I appreciate your prompt attention to this important matter. Please contact Heather Sawyer on my staff at (202) 224-7703 to discuss arrangements for production.

Sincerely,



Dianne Feinstein  
United States Senator

Enclosure

CC: The Honorable Charles E. Grassley

## ATTACHMENT A

### Instructions and Definitions:

1. The documents requested include all those that are in your custody, control or possession, or within your or your representative's right of custody, control or possession.
2. The terms "**you**" and "**your**" means the person to whom this request was addressed, including Cambridge Analytica, its divisions, and any present or former representative of the foregoing.
3. The term "**person**" means a natural person, firm, association, organization, partnership, business, trust, corporation, bank or any other private or public entity.
4. The term "**representative**" means any present or former family members, officers, executives, partners, joint-venturers, directors, trustees, employees, consultants, accountants, attorneys, agents, or any other representative acting or purporting to act on behalf of another person.
5. The term "**Trump campaign**" means Donald J. Trump for President, Inc. and any related Trump campaign entities and all of its present and former directors, officers, employees, agents, consultants, advisors, associates, or representatives.
6. 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: agreements; papers; memoranda; correspondence; reports; studies; reviews; analyses; graphs; diagrams; photographs; charts; tabulations; presentations; working papers; records; records of interviews; desk files; notes; letters; notices; confirmations; telegrams; faxes, telexes, receipts; appraisals; interoffice and intra office communications; electronic mail (e-mail); electronic messages; text messages; contracts; cables; recordings, notations or logs of any type of conversation, telephone call, meeting or other communication; bulletins; printed matter; computer printouts; teletype; invoices; transcripts; audio or video recordings; statistical or informational accumulations; data processing cards or worksheets; computer stored or generated documents; computer databases; computer disks and formats; machine readable electronic files; data or records maintained on a computer; instant messages; diaries; questionnaires and responses; data sheets; summaries; minutes; bills; accounts; estimates; projections; comparisons; messages; correspondence; and similar or related materials. 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.
7. 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 face to face, in meeting, by telephone, mail, telex, facsimile, computer, discussions, releases, delivery, or otherwise.

8. The term “**concerning**” means directly or indirectly, in whole or in part, describing, constituting, evidencing, recording, evaluating, substantiating, concerning, referring to, alluding to, in connection with, commenting on, relating to, regarding, discussing, showing, describing, analyzing or reflecting.
9. To the extent necessary to bring within the scope of this request any information or Documents that might otherwise be construed to be outside its scope:
  - a. the word “**or**” means “and/or”
  - b. the word “and” means “and/or”;
  - c. the functional words “each,” “every,” “any,” and “all” shall each be deemed to include each of the other functional words;
  - d. the masculine gender includes the female gender and the female gender includes the masculine gender; and
  - e. the singular includes the plural and the plural includes the singular.
10. If the request cannot be complied with in full, it shall be complied with to the extent possible, with an explanation why a full response is not possible. Any document withheld on the basis of privilege shall be identified on a privilege log submitted with the responses to this request. The log shall state the date of the document, the type of document and number of pages, its author, his or her occupation and employer, all recipients, the occupation and employers of each recipient, the subject matter, the privilege claimed, and a brief explanation of the basis of the claim of privilege. If any document responsive to this request was but no longer is in your possession, custody, or control, identify the document and explain the circumstances by which it ceased to be in your possession, custody, or control.
11. Documents should be labeled with sequential numbering (bates-stamped).
12. Unless otherwise specified, the time period covered by this request is from January 1, 2015 to the date of production.