



U.S. OFFICE OF SPECIAL COUNSEL
1730 M Street, N.W., Suite 218
Washington, DC 20036-4505
(202) 254-3600

September 18, 2012

Mr. Daniel Epstein, Esq.
Mr. Brandon Sherman, Esq.
Cause of Action
2100 M Street, NW
Suite 170-247
Washington, DC 20037-1233

RE: Freedom of Information Act Request (Ref. # FO-12-0191)

Dear Messrs. Epstein and Sherman:

I am writing to provide a ninth interim response and status update for the outstanding items in your Freedom of Information Act (FOIA) request: numbers 17, 18, 29(b) and 29(d). The U.S. Office of Special Counsel (OSC) has completed processing of request items 17, 18, 29 (b) and part of 29(d).

In my letter dated August 31, 2012, I alluded to two pages that are responsive to request items 17, 18, and 29(b), and which required processing. OSC has processed those pages, and they are enclosed, with one redaction pursuant to FOIA Exemption 6.¹ A ten-page Congressional letter which was attached to the two-page e-mail is also released by enclosure.

The processing of records responsive to item 29(d) is partially complete; five pages of responsive material are withheld under FOIA Exemption 7(C),² while approximately 40 pages responsive to 29(d) require further processing. OSC expects to complete the processing of these last remaining pages and provide a response or a relevant status update no later than September 28, 2012. If you would like to discuss any aspect of your request, please feel free to contact me at (202) 254-3716.

¹ Information covered by your request is withheld under the authority of FOIA exemption 6, because the information concerns personnel matters, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. § 552(b)(6).

² Information covered by your request is withheld under the authority of FOIA exemption 7, because the information was compiled for law enforcement purposes and because disclosure could reasonably be expected to constitute an unwarranted invasion of personal privacy. § 552(b)(7)(C).

U.S. Office of Special Counsel
Letter to Daniel Epstein, Esq.
September 18, 2012

You have the right to appeal these determinations under the FOIA. Any such appeal must be in writing, and be received within 45 days of the date of this letter. The appeal should be sent to the Office of the General Counsel, Office of Special Counsel, at the address shown at the top of this letter.

Sincerely,

/s/

Christopher Kurt
FOIA/Privacy Act Officer
Office of General Counsel

Miles, Adam

From: Miles, Adam
Sent: Tuesday, July 12, 2011 11:38 AM
To: Lerner, Carolyn
Subject: RE: Issa to Counsel to the President

She's on the democratic staff at Oversight w/ Krista and Miles.

From: Lerner, Carolyn
Sent: Tuesday, July 12, 2011 11:37 AM
To: Miles, Adam
Subject: Re: Issa to Counsel to the President

Who is amy miller?

From: Miles, Adam
To: Lerner, Carolyn
Sent: Tue Jul 12 10:55:09 2011
Subject: RE: Issa to Counsel to the President
Great. First 2 full paragraphs on page 4 seem the most relevant for us.

From: Lerner, Carolyn
Sent: Tuesday, July 12, 2011 10:54 AM
To: Miles, Adam
Subject: Re: Issa to Counsel to the President

Opened it. No need to re-send

From: Miles, Adam
To: Lerner, Carolyn; Cohen, Mark; Marrone, Ana
Sent: Tue Jul 12 10:44:55 2011
Subject: FW: Issa to Counsel to the President

From: Miles, William [✓] [@mail.house.gov](mailto:_____@mail.house.gov)
Sent: Tuesday, July 12, 2011 10:34 AM
To: Boyd, Krista
Cc: Miles, Adam; Miller, Amy
Subject: FW: Issa to Counsel to the President

✓ = (b)(6)

FYI

From: Thomas, Cecelia
Sent: Tuesday, July 12, 2011 10:09 AM
To: Miles, William

Cc: Grooms , Susanne Sachsman; Rapallo, Dave; Hultberg, Carla; Etienne, Ashley

Subject: Issa to Counsel to the President

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COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

Telephone: (202) 225-5974
Facsimile: (202) 225-3974
Mailing: (202) 225-6051

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July 11, 2011

The Honorable Kathryn Ruemmler
Counsel to the President
The White House
Washington, DC 20500

Dear Ms. Ruemmler:

Recent media reports indicate that the Obama Administration may be engaging in an array of potentially illegal fundraising behavior. These reports raise serious questions about whether the Administration – in its apparent push to raise unprecedented sums of money for the President’s re-election effort – is failing to comply with federal campaign finance laws, restrictions on official involvement in political events, and other federal laws. I am asking for your immediate assistance so that the Committee may determine whether any of these reports have merit.

According to the *New York Times*, on or about March 7, 2011, President Obama and unspecified White House employees hosted an event in the Blue Room of the White House.¹ The White House has characterized the event as a brainstorming session with business leaders about ways to improve the economy.² Media reports about the event, however, call into question its true purpose. For example, *Politico* observes that each of the assembled business leaders in the Blue Room on March 7, according to Federal Election Commission records, had donated to President Obama’s campaign in 2007 or 2008.³ Also, although White House Press Secretary Jay Carney publicly described the

¹ See, e.g., Nicholas Confessore, *Obama Seeks to Win Back Wall St. Cash*, N.Y. TIMES, <http://www.nytimes.com/2011/06/13/us/politics/13donor.html> (Jun. 12, 2011) (noting that the meeting was for the purposes of asking invitees’ “thoughts on how to speed the economic recovery”).

² See *id.*

³ See Josh Gerstein, *All at DNC Blue Room meeting with Obama were donors*, POLITICO, http://www.politico.com/blogs/joshgerstein/0611/All_at_DNC_Blue_Room_meeting_with_Obama_were_donors.html (Jun. 26, 2011). The event attendees in question were Thomas Bernstein (co-founder of Chelsea Piers, L.P., and chairman of the Holocaust Memorial Museum in Washington, D.C.) and Andrea Bernstein; Frank Brosens (Taconic Capital Group); Jon Corzine (former Democratic governor of New Jersey and former CEO of Goldman Sachs); Gordon Davis (partner at Dewey & LeBoeuf law firm, and former president of Lincoln Center for the Performing Arts); James Dinan (founder of York Capital Management); Glenn Dubin (CEO of Highbridge Capital Management); Blair Effron (partner at Centerview Partners); Mark Gallogly (co-founder of Centerbridge Partners and a member of the President’s Economic Recovery Advisory Board); Jeffrey Gural (chairman of the real estate firm Newmark Knight Frank); Jane Hartley

gathering as an official meeting intended to solicit economic advice from key figures in industry,⁴ the Democratic National Committee (DNC) organized and sponsored it, and DNC leadership was in attendance.⁵

Notwithstanding the stated official purpose of this event, this meeting was not included on President Obama's public schedule, calling into question its official nature.⁶ Individuals in attendance have essentially affirmed that the underlying – if not overtly stated – purpose of the event was to solidify financial support for the upcoming campaign.⁷ The reporting on this event follows intensive fundraising efforts by Administration surrogates involving some of the very individuals who attended the March 7 meeting.⁸

(CEO of Observatory Group); Paul T. Jones II (founder of Tudor Investment Corporation); Michael Kempner (CEO at MWW Group and a member of the White House's Council for Community Solutions); Sarah Kovner (board member of both the Alliance of Justice and NARAL Pro-Choice New York, and former deputy director for the 1992 New York State Clinton-Gore campaign); Orin Kramer (general partner of Boston Provident); Marc Lasry (co-founder and CEO of Avenue Capital Group); Margo Lion (Broadway producer and co-chairwoman of Obama's Committee on the Arts and Humanities); Brian Mathis (co-managing member of Provident Group, Ltd., and co-managing partner of Longship Capital Management, LLC); Eric Mindich (founder of Eton Park Capital Management); Richard Richman (chairman of rental property owner and developer The Richman Group) and Ellen Richman; James Rubin (BC Partners); William Rudin (CEO of Rudin Management); Rick Schifter (partner at TPG Capital, formerly Texas Pacific Group); Ralph Schlosstein (president and CEO of Evercore Partners); Bernard Schwartz (philanthropist, supporter of the Democratic Leadership Council, and former CEO of Loral Space & Communications); Jay Snyder (principal of HBJ Investments); James Staley (CEO of J.P. Morgan Chase & Co.'s Investment Bank); and Robert Wolf (chairman of UBS Group Americas).

⁴ See, e.g., Josh Gerstein, *Donor meeting at W.H. draws fire*, POLITICO, <http://www.politico.com/news/stories/0611/57389.html> (Jun. 20, 2011) (highlighting White House Press Secretary Jay Carney's comments that the event was not a fundraiser, but rather an opportunity for the president "to consult with business executives about their ideas" on economic improvement).

⁵ See, e.g., Nicholas Confessore, *Obama Seeks to Win Back Wall St. Cash*, N.Y. TIMES, <http://www.nytimes.com/2011/06/13/us/politics/13donor.html> (Jun. 12, 2011); see also Josh Gerstein and Matt Negrin, *W.H. releases DNC meet names*, POLITICO, <http://www.politico.com/news/stories/0611/57745.html> (Jun. 24, 2011) (showing that DNC treasurer Andy Tobias, DNC executive director Patrick Gaspard, and DNC fundraising coordinator Brad Thompson were all also in attendance at this event, and that the DNC picked up the declared \$68 cost of the event).

⁶ See Josh Gerstein and Matt Negrin, *W.H. releases DNC meet names*, POLITICO, <http://www.politico.com/news/stories/0611/57745.html> (Jun. 24, 2011).

⁷ See Josh Gerstein, *Donor meeting at W.H. draws fire*, POLITICO, <http://www.politico.com/news/stories/0611/57389.html> (Jun. 20, 2011) (citing two anonymous event attendees who confirmed the campaign-related nature of the event, and quoting one of them as saying that the event "was policy-focused, but everyone knew why they were there").

⁸ See, e.g., Nicholas Confessore, *Obama Seeks to Win Back Wall St. Cash*, N.Y. TIMES, <http://www.nytimes.com/2011/06/13/us/politics/13donor.html> (Jun. 12, 2011) (noting that Obama campaign manager Jim Messina orchestrated fundraising efforts in New York, and that these efforts included a fundraiser in the home of Marc Lasry, who was in attendance in the Blue Room on March 7).

Shortly thereafter, the *Washington Post* reported blatant and potentially illegal use of the White House and other official government resources for fundraising purposes.⁹ Against the backdrop of an already unprecedented number of presidential fundraisers for this stage of a presidential re-election campaign,¹⁰ President Obama appears to be aggressively using the White House itself and federal employees within the Executive Office of the President (EOP) to solicit donations. Several reports have indicated that President Obama has launched an all-out campaign to reinvigorate the enthusiasm of large and small donors alike by “leveraging every asset available to a sitting president – from access to **top West Wing officials** to a possible food tasting with the **White House chef.**”¹¹ President Obama has even seen fit to auction off time with both the President and Vice President as part of this fundraising drive, a pitch that he made personally in a campaign video that appears to have been filmed inside the White House.¹² These and other stories discuss different types of access that the Administration is apparently willing to provide in exchange for campaign contributions.¹³

Putting aside the negative impact that these fundraising tactics will have on the stature of the presidency generally, some of these tactics may also violate federal law. Indeed, these same press accounts that have described President Obama’s campaign video – which actively solicits campaign donations in exchange for an opportunity to meet and dine with the President and Vice President – state that the video may be illegal if it was filmed inside the White House.¹⁴

These fundraising activities appear to be part of a broader Administration strategy to maximize campaign donations for the upcoming campaign while simultaneously using

⁹ Peter Wallsten, *Obama pushing behind scenes to win over big-dollar donors*, WASH. POST, http://www.washingtonpost.com/business/economy/obama-pushing-behind-scenes-to-win-over-big-dollar-donors/2011/06/24/AGO5NGoH_print.html (Jun. 27, 2011).

¹⁰ See Julie Mason, *Obama’s 30th fundraiser tonight*, POLITICO, http://www.politico.com/politico44/perm/0611/kaching_fa0c7fd4-498f-4970-b51c-38e06897f41c.html (Jun. 20, 2011) (stating that President Obama was attending his 30th presidential fundraiser on June 20, 2011, whereas former President George W. Bush had only attended his third presidential fundraiser at this point prior to the 2004 presidential campaign).

¹¹ See, e.g., Wallsten, *supra* note 9 (emphasis added).

¹² See Jim Geraghty, *The Political Use of the White House ‘Just Got More Interesting,’* NATIONAL REVIEW ONLINE, <http://www.nationalreview.com/campaign-spot/270598/political-use-white-house-just-got-more-interesting> (Jun. 27, 2011) (describing the video and comparing it to other official Administration videos that appear to have been filmed inside the White House).

¹³ See, e.g., Wallsten, *supra* note 9 (noting how the main campaign strategy appears to involve giving donors access to presidential aides and campaign strategists); Matt Cover, *President Hosted Unscheduled ‘DNC Event’ at White House, Visitor Logs Reveal*, CNSNEWS.COM, <http://www.cnsnews.com/news/article/president-hosted-unscheduled-dnc-event-w> (Jun. 29, 2011) (discussing an unscheduled White House State Floor event that White House visitor logs described as a “DNC Event”).

¹⁴ See Report: *Obama Films Campaign Ad In White House, Possibly Violating FEC Laws?*, REAL CLEAR POLITICS VIDEO, http://www.realclearpolitics.com/video/2011/06/27/dinner_with_obama_now_includes_joe_biden.html (Jun. 27, 2011); see also Alexis Simendinger, *White House Says Obama Fundraising Appeal Not Illegal*, REAL CLEAR POLITICS, http://www.realclearpolitics.com/articles/2011/06/28/white_house_says_obama_fundraising_appeal_not_illegal.html (Jun. 28, 2011) (claiming that White House officials have confirmed that the video, which was filmed by the DNC, was made inside the White House).

official resources to suppress the fundraising of potential political opponents. On the latter point, I refer specifically to President Obama's recently proposed executive order that would require federal government contractors to disclose their political contributions in order to compete for future government contracts.¹⁵

Simply stated, the Committee asks you to address these recent incidents squarely. While presidents and vice presidents undoubtedly may solicit donors and raise campaign funds, they cannot use the assets of government – which include federal employees under their supervision and federal buildings and other property – to do so.¹⁶ In addition, utilizing federal employees to orchestrate ostensible campaign or fundraising events, particularly on federal property, raises the possibility of Hatch Act¹⁷ violations.

We have repeatedly asked for the Administration's input regarding its ideas for improving the relationship between the official and the political spheres. Most recently, on June 21, 2011, this Committee conducted a hearing that focused on potential revisions of the Hatch Act, with an eye toward striking a balance between these two spheres. Unfortunately, the Administration – once again – declined to send a representative, and also declined on behalf of DNC executive director Patrick Gaspard, claiming that “White House staff generally do not testify before Congress.”¹⁸ While we were disappointed in the White House's refusal to take part in what we believe was an important conversation, we are equally disappointed to observe the White House engaging in more strident, and potentially illegal, blending of the official and the political.

In this time of economic challenge and uncertainty – when millions of Americans are unemployed and seeking the basic comfort of a paycheck – the Administration has chosen to emphasize campaign branding and fundraising rather than working to strengthen the economy. Promoting the “Obama brand”¹⁹ and building a \$1 billion campaign war chest²⁰ ought to be secondary to improving the economy and providing economic stability for American families.

¹⁵ See Tina Korbe, *Senators Ask White House to Abandon Executive Order Limiting Political Speech*, THE FOUNDRY (HERITAGE FOUNDATION), <http://blog.heritage.org/2011/04/28/senators-ask-white-house-to-abandon-executive-order-limiting-political-speech/> (Apr. 28, 2011) (discussing the proposed order and its potentially oppressive impact).

¹⁶ See 18 U.S.C. § 607 (stating that “[i]t shall be unlawful for an individual who is an officer or employee of the Federal Government, including the *President, Vice President, and Members of Congress*, to *solicit or receive* a donation of money or other thing of value in connection with a Federal, State, or local election, while in *any room or building occupied in the discharge of official duties* by an officer or employee of the United States, from any person”) (emphasis added).

¹⁷ See 5 U.S.C. §§ 7321-7326.

¹⁸ Letter from Robert F. Bauer, Counsel to the President, Executive Office of the President, to Darrell Issa, Chairman, H. Comm. on Oversight and Gov't Reform (Jun. 16, 2011).

¹⁹ See Peter Baker, *Obama Social Secretary Ran Into Sharp Elbows*, N.Y. TIMES, <http://www.nytimes.com/2010/03/12/us/politics/12rogers.html> (Mar. 11, 2010) (noting how former White House social secretary Desiree Rogers publicly referred to promotion of the “Obama brand” as part of her job within the White House).

²⁰ See Peter Wallsten, *Obama pushing behind scenes to win over big-dollar donors*, WASH. POST, <http://www.washingtonpost.com/business/economy/obama-pushing-behind-scenes-to-win-over-big-dollar->

The Committee now seeks additional information about aforementioned events and activities. We believe it is of the utmost importance to ensure that relevant federal laws are being obeyed. Furthermore, it is in the best interests of both the taxpayers and the Administration for you to assist us in making this determination as quickly as possible.

The Committee therefore requests that the Administration produce the following documents and information for the time period from November 1, 2010, to the present:

- 1) Documents and communications between and among EOP personnel relating to the March 7, 2011, Blue Room event, including draft and finalized invitation lists, RSVP notices, and communications with non-federal parties, including the DNC, about the event.
- 2) Documents and communications between and among personnel in the EOP relating to any other DNC-planned events that have used, or have discussed the use of, any room of the White House, the Eisenhower Executive Office Building, the New Executive Office Building, or any other federal property on or off the White House grounds.
- 3) Documents and materials relating to the production of the "Dinner with Barack and Joe" presidential campaign fundraising video, including any raw video footage or script-related materials.
- 4) Documents and communications between and among EOP personnel relating to the use of federal personnel for fundraising purposes, including having federal employees attend fundraising events.

We also request that you provide to the Committee any additional materials that fall into the above categories on a continuing basis but are created, written or otherwise produced after initial receipt of this request.

Please provide the requested documents and information as soon as possible, but no later than noon on July 26, 2011. When producing documents to the Committee, please deliver separate production sets to both 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. The Committee prefers, if possible, to receive all documents in electronic format.

The Honorable Kathryn Ruemmler
July 11, 2011
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The Committee on Oversight and Government Reform is the principal oversight committee of the House of Representatives and may at "any time" investigate "any matter" as set forth in House Rule X.²¹ An attachment to this letter provides additional information about responding to the Committee's request.

If you have any questions regarding any aspect of this request, please contact Ashok Pinto or John Zadrozny of the Committee staff at (202) 225-5074. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell Issa", written over a horizontal line.

Darrell Issa
Chairman

Enclosure

cc: The Honorable Elijah E. Cummings, Ranking Member

²¹ RULE X, RULES OF THE U.S. HOUSE OF REPRESENTATIVES, 112TH CONGRESS (Jan. 5, 2011).

ONE HUNDRED TWELFTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

Majority (202) 225-5074
Minority (202) 225-5051

Responding to Committee Document Requests

1. In complying with this request, you should produce all responsive documents that are in your possession, custody, or control, 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. Requested 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 request has been, or is also known by any other name than that herein denoted, the request 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 request shall be produced together with copies of file labels, dividers or identifying markers with which they were associated when they were requested.
8. When you produce documents, you should identify the paragraph in the Committee's request 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 requested 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 request cannot be made in full, compliance shall be made to the extent possible and shall include an explanation of why full compliance is not possible.
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. If any document responsive to this request 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.
14. If a date or other descriptive detail set forth in this request 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 request, you should produce all documents which would be responsive as if the date or other descriptive detail were correct.
15. The time period covered by this request is included in the attached request. To the extent a time period is not specified, produce relevant documents from January 1, 2009 to the present.
16. This request is continuing in nature and applies to any newly-discovered information. Any 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.

17. All documents shall be Bates-stamped sequentially and produced sequentially.
18. 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.
19. 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.

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 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, 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 request 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 "identify," when used in a question about individuals, means to provide the following information: (a) the individual's complete name and title; and (b) the individual's business address and phone number.
6. 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.