

ONE HUNDRED EIGHTEENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON THE JUDICIARY

2138 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6216

(202) 225-6906
judiciary.house.gov

August 28, 2024

Mr. Michael Nellis
Founder and Chief Executive Officer
Authentic Campaigns Inc.
4422 N. Ravenswood Ave., #101
Chicago, IL 60640

Dear Mr. Nellis:

On August 1, 2024, the Committee on the Judiciary wrote to Loren Merchan, the President of Authentic Campaigns, requesting information and documents to advance the Committee's oversight of the Manhattan District Attorney's political prosecution of President Donald J. Trump.¹ You responded on August 13, 2024, declining to comply voluntarily with the Committee's oversight or provide any requested documents.² On August 16, 2024, the Committee wrote again to address your articulated concerns and to reiterate its August 1 requests.³ On August 23, 2024, you again declined to comply with the Committee's oversight and requests.⁴ As such, the Committee is left with no choice but to resort to compulsory process.

As we made clear in our August 1 and August 16 letters, the Committee is continuing to conduct oversight of politically motivated prosecutions by state and local officials.⁵ Popularly elected prosecutors, such as Manhattan District Attorney Alvin Bragg, have engaged in an unprecedented abuse of authority by prosecuting a former President of the United States and current nominee for that office. Of relevance to the Committee's oversight is the impartiality of Judge Juan Merchan, the presiding trial judge, due to his refusal to recuse himself from the case in light of his apparent conflicts of interest and biases.⁶ One such conflict is Ms. Merchan's—daughter of Judge Merchan and President of Authentic Campaigns—work on behalf of President Trump's political adversaries and the possible financial benefit that Ms. Merchan and Authentic Campaigns received from the prosecution and conviction of President Trump.

¹ See Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Loren Merchan (Aug. 1, 2024).

² Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 13, 2024).

³ Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Michael Nellis (Aug. 16, 2024).

⁴ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 23, 2024).

⁵ Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Loren Merchan (Aug. 1, 2024); Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Michael Nellis (Aug. 16, 2024).

⁶ Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Loren Merchan (Aug. 1, 2024).

Mr. Michael Nellis

August 28, 2024

Page 2

Public reporting makes clear that both you and Ms. Merchan have been closely involved in the presidential campaigns of both President Biden and Vice President Harris. Ms. Merchan previously served in then-presidential candidate Harris's campaign in 2019 while remaining employed at Authentic Campaigns.⁷ During Ms. Merchan's employment with the Harris campaign, Authentic Campaigns received over \$7 million in compensation for its services.⁸ You also worked for then-presidential candidate Harris and it appears you continue to do so.⁹ Authentic Campaigns conducted work for the 2020 Biden-Harris campaign and, according to public records, was paid just over \$2 million in a one-month period for its work.¹⁰

In your August 13 response to the Committee, you indicated that responsive records existed for at least two of the Committee's requests but later, in your August 23 response, you suggest that records only exist for a single request. Regarding this request, you attempt to evade oversight by arguing that the Committee's request for records related to Authentic Campaigns' work performed as it relates "to the indictment, prosecution, or conviction of President Donald J. Trump"¹¹ is "irrelevant to any investigation."¹² You also argue that "any content relating to the trial was an extremely small amount . . ."¹³ Such a determination is not yours to make, and in any event, the Committee has explained the relevancy of these records to its oversight and the quantity of responsive documents—even if small—does not create an exception to the Committee's request. Neither does your assertion that "Ms. Merchan had no involvement in any such content . . ."¹⁴ The Committee's investigation is not limited to Ms. Merchan. Rather, as has been explained, the Committee is investigating "whether Authentic Campaigns services President Trump's political adversaries."¹⁵ As such, your rationales for refusing to provide responsive documents are unpersuasive.

In response to the Committee's other request, you first argued in your August 13 response that "[a]ny communication" that Ms. Merchan may have had with her father, Judge Merchan, regarding the trial would have been "in her personal capacity . . . and entirely unrelated

⁷ Mia Cathell (@MiaCathell), TWITTER (Apr. 4, 2023, 3:13 PM), <https://x.com/MiaCathell/status/1643331072069976068>.

⁸ Vendor/Recipient Profile: Authentic Campaigns for the 2020 Election Cycle, OPEN SECRETS (last visited July 31, 2024); Mia Cathell (@MiaCathell), Twitter (Apr. 4, 2023, 3:13 PM), <https://x.com/MiaCathell/status/1643331072069976068>.

⁹ Mike Nellis (@MikeNellis), TWITTER (Aug. 2, 2024), <https://x.com/MikeNellis/status/1819563112741458390> ("I worked for @KamalaHarris for a long time. . . . The VP was the first person to call me when my son was born in the middle of her presidential campaign (I still have the VM). . . ."); Craig Wall, *Online fundraisers for Vice President Kamala Harris's presidential campaign raise over \$200 million*, ABC 7 (July 30, 2024) ("Chicagoan Mike Nellis, a former Harris campaign senior advisor, helped organize the [White Dudes for Harris] event, which raised \$4 million.").

¹⁰ Biden/Harris 2020 Campaign: A Conversational AI Case Study, Authentic (last visited July 31, 2024); Vendor/Recipient Profile: Authentic Campaigns for the 2020 Election Cycle, Open Secrets (last visited Aug. 23, 2024) (The first payment from Biden for President was made on October 8, 2020 and the last payment was made on November 3, 2020.).

¹¹ Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Loren Merchan (Aug. 1, 2024).

¹² Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 13, 2024).

¹³ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 23, 2024); Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 13, 2024).

¹⁴ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 23, 2024).

¹⁵ Letter from Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary, to Michael Nellis (Aug. 16, 2024).

to Authentic or its clients.”¹⁶ You then asserted on August 23 that Authentic Campaigns has no responsive documents or communications at all.¹⁷ This shifting representation raises significant doubt about the accuracy of your assertions. Your first statement on August 13 about the nature of Ms. Merchan’s communications with Judge Merchan suggests at least some knowledge about those records such that you could attest that they were all made “in her personal capacity.”¹⁸ Notably, in this initial response, you did not assert that Authentic Campaigns possessed no responsive records. Your subsequent, blanket assertion on August 23 that no records exist—made without explaining your basis for this statement—viewed in light of your August 13 response, suggests that you may be artificially narrowing the Committee’s request to only records of a non-personal nature. The Committee’s request makes no such distinction. If Ms. Merchan used Authentic Campaign accounts, devices, or other electronic communication systems to communicate with Judge Merchan about President Trump’s trial, even if the communications were made “in her personal capacity,” those records are responsive to the Committee’s request.

In your August 23 response, you also argue that the Committee does not have a “valid legislative purpose” and that the Committee does not have “any legitimate reason” to conduct its inquiry.¹⁹ As we have explained twice, the Supreme Court has recognized that Congress has a “broad and indispensable” power to conduct oversight, which “encompasses inquiries into the administration of existing laws, studies of proposed laws, and surveys in our social, economic or political system for the purpose of enabling Congress to remedy them.”²⁰ Early last year, a federal district court judge denied District Attorney Alvin Bragg’s attempt to block the enforcement of the Committee’s subpoena in this very investigation. Judge Mary Kay Vyskocil held that the Committee’s subpoena “was issued with a ‘valid legislative purpose’ in connection with the ‘broad’ and ‘indispensable’ congressional power to ‘conduct investigations.’”²¹ As Judge Vyskocil explained:

Jordan and the Committee have identified several valid legislative purposes underlying the subpoena. . . . [The Committee] identif[ies] the possibility of legislative reforms to insulate current and former presidents from state prosecutions, such as by removing criminal actions filed against them from state to federal court. Congress, of course, has authority to consider, and to investigate, this potential legislative reform. And Congress also has authority to investigate legislative reforms to prevent local prosecutions that could potentially interfere with federal elections.²²

¹⁶ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 13, 2024).

¹⁷ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 23, 2024).

¹⁸ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 13, 2024).

¹⁹ Letter from Michael Nellis to Rep. Jim Jordan, Chairman, H. Comm. on the Judiciary (Aug. 23, 2024).

²⁰ *See, e.g., Trump v. Mazars LLP*, No. 19-715 at 11 (U.S. slip op. July 9, 2020) (internal quotation marks and citation marks omitted).

²¹ Opinion and Order Denying Temporary Restraining Order, *Bragg v. Jordan*, 1:23-cv-3032 (MKV) (SDNY Apr. 19, 2023).

²² *Id.* (internal citations omitted).

We have explained the proposed legislative reforms that the Committee and the House have been examining. Judge Merchan's conflicts of interest and biases in the case against President Trump, the Republican nominee in the upcoming 2024 presidential election, implicate serious federal interests.²³ Congress has a specific and manifestly important interest in preventing politically motivated prosecutions of current and former presidents, especially in venues in which real or perceived biases exist. Among other things, if state or local prosecutors are able to engage in politically motivated prosecutions of Presidents of the United States (current or former) for personal acts, this could have a profound effect on how presidents choose to exercise their powers while in office. The requested material will inform the House's consideration of whether to move forward with legislation, informed by the Committee's oversight, which, if adopted, would remedy politically motivated local prosecutions by allowing a current or former president to remove the case to a more neutral forum in federal court.²⁴ If such a mechanism were in place at the time of DA Bragg's prosecution, Judge Merchan would not have presided over President Trump's trial.

The Committee is charged by the House of Representatives with upholding fundamental American civil liberties and with promoting fairness and consistency in our nation's criminal justice system. Rule X of the Rules of the House of Representatives authorizes the Committee to conduct oversight of criminal justice matters and matters involving civil liberties to inform potential legislation.²⁵ The records requested from Authentic Campaigns are relevant to the Committee's oversight work. These documents will allow the Committee to better understand and assess the apparent conflicts of interest and bias in the prosecution of a former president by a local elected prosecutor in a local tribunal before a clearly conflicted judge.

Accordingly, in light of Authentic Campaigns' failure to comply with our earlier voluntary requests, please find attached a subpoena compelling the production of the requested documents. As an accommodation, the Committee has limited the scope of this subpoena to two of its initial requests made on August 1. To ensure accuracy and completeness in the Committee's investigation, and based upon the noted inconsistencies in your previous responses, we direct your attention to instruction 19 in the enclosed subpoena schedule requiring a certification about your efforts to identify and produce responsive material. If Authentic Campaigns indeed has no responsive records for the other requests made by the Committee on August 1, as you have asserted, the Committee requests a sworn certification under the penalty of perjury²⁶ that Authentic Campaigns made a reasonable, diligent, and good faith search for responsive documents and was unable to locate any responsive documents. We also ask that you detail with specificity the steps that you took to conduct this search, including the email account(s), text message(s), and other means of communications that you reviewed. Finally, we

²³ See H. COMM. ON THE JUDICIARY, 118TH CONG., LAWFARE: HOW THE MANHATTAN DISTRICT ATTORNEY'S OFFICE AND A NEW YORK STATE JUDGE VIOLATED THE CONSTITUTIONAL AND LEGAL RIGHTS OF PRESIDENT DONALD J. TRUMP (2024).

²⁴ H.R. 2553, 118th Cong. (2023).

²⁵ Rules of the U.S. House of Representatives, R. X(1)(5) (2023).

²⁶ See 18 U.S.C. § 1621.

Mr. Michael Nellis

August 28, 2024

Page 5

request that Authentic Campaigns also certify under the penalty of perjury that the attestations contained in your August 13 and 23 letters are completely true and accurate.

If you have any questions about this matter, please contact Committee staff at (202) 225-6906. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Jim Jordan". The signature is stylized with a large, looping "J" and "D".

Jim Jordan
Chairman

cc: The Honorable Jerrold L. Nadler, Ranking Member

Enclosure

SUBPOENA

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

To Michael Nellis, Founder and Chief Executive Officer, Authentic Campaigns Inc.

You are hereby commanded to be and appear before the
Committee on the Judiciary

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: House Committee on the Judiciary, 2138 Rayburn House Office Building

Date: September 13, 2024

Time: 9:00 a.m.

- 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 The U.S. Marshals Service, or any authorized Member or congressional staff

_____ 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 29th day of August, 2024

Attest:

J. Jordan
Chairman or Authorized Member

[Signature]
Clerk

PROOF OF SERVICE

Subpoena for

Michael Nellis, Founder and Chief Executive Officer, Authentic Campaigns Inc.

Address 4422 N. Ravenswood Ave., #101, Chicago, IL 60640

before the Committee on the Judiciary



*U.S. House of Representatives
118th Congress*

Served by (print name) _____

Title _____

Manner of service _____

Date _____

Signature of Server _____

Address _____

SCHEDULE A

In accordance with the attached Schedule instructions, you, Michael Nellis, Founder and Chief Executive Officer of Authentic Campaigns Inc. (Authentic Campaigns), are required to produce the following items in your possession, custody, or control in unredacted form:

1. All documents and communications referring or relating to any work performed by Authentic Campaigns that refers to the indictment, prosecution, or conviction of President Donald J. Trump for the period April 1, 2023, to the present; and
2. All documents and communications between or among Authentic Campaigns or any of its employees, agents, or representatives and Judge Juan Merchan or any of his employees or representatives referring or relating to the indictment, prosecution, or conviction of President Donald J. Trump for the period April 1, 2023, to the present.

INSTRUCTIONS

For the purposes of this Subpoena, please apply the instructions and definitions as set forth below:

1. In complying with this subpoena, you are required to produce all responsive documents in unredacted form that are in your possession, custody, or control or otherwise available to you, regardless of whether the documents are possessed directly by you.
2. Requested documents responsive to the subpoena shall not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.
3. In the event that any entity, organization, or individual denoted in this subpoena has been, or is currently, known by any other name, the subpoena shall be read also to include such other names under that alternative identification.
4. The Committee's preference is to receive documents responsive to the subpoena in electronic form (i.e., via cloud content services, CD, memory stick, or thumb drive) in lieu of paper productions. Committee staff shall be consulted prior to production to discuss the best production method. If documents are produced in paper form, each document should be produced in a form that may be copied by standard copying machines.
5. Documents produced in electronic format should also be organized, identified, and indexed electronically.
6. Documents produced pursuant to this subpoena shall be produced in the order in which they appear in your files and should not be rearranged. Any documents that are stapled, clipped, or otherwise fastened together should be produced together in the order they appear in your files. Documents produced in response to this subpoena should be produced together with copies of file labels, dividers, or identifying markers with which they were associated when this subpoena was issued. Indicate the office or division and person from whose files each document was produced.
7. Documents produced to the Committee should include an index describing the contents of the production and should identify the paragraph(s) and/or clause(s) in the Committee's schedule to which the document responds. 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.
8. All documents shall be Bates-stamped sequentially and produced sequentially.

9. Responsive documents must be produced regardless of whether any other person or entity possesses non-identical or identical copies of the same document.
10. If any document responsive to this subpoena was, but no longer is, in your possession, custody, or control, or has been placed into the possession, custody, or control of any third party and cannot be provided in response to this subpoena, you should 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, or was placed in the possession, custody, or control of a third party.
11. If any document responsive to this subpoena was, but no longer is, in your possession, custody or control, state:
 - a. how the document was disposed of;
 - b. the name, current address, and telephone number of the person who currently has possession, custody or control over the document;
 - c. the date of disposition; and
 - d. the name, current address, and telephone number of each person who authorized said disposition or who had or has knowledge of said disposition.
12. If any document responsive to this subpoena cannot be located, describe with particularity the efforts made to locate the document and the specific reason for its disappearance, destruction, or unavailability.
13. If a date or other descriptive detail set forth in this subpoena referring to a document, communication, meeting, or other event 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 should produce all documents which would be responsive as if the date or other descriptive detail were correct.
14. This subpoena is continuing in nature and applies to any newly discovered documents, regardless of the date of its creation. Any document not produced because it has not been located or discovered by the return date should be produced immediately upon location or discovery subsequent thereto.
15. A cover letter shall be included with each production and shall including the following:
 - a. A total page count for the entire production, including both hard copy and electronic documents;
 - b. A list of custodians, identifying the Bates range for each custodian; and
 - c. All Bates Prefix and Suffix formats for all documents contained in the production.
16. Two sets of the documents should be delivered to the Committee, one set to the majority staff in Room 2138 of the Rayburn House Office Building and one set to the

minority staff in Room 2142 of the Rayburn House Office Building. You should consult with Committee majority staff regarding the method of delivery prior to sending any materials.

17. In the event that a responsive document or portion thereof is withheld on any basis, including by a claim of privilege, you should provide a log containing the following information concerning every such document: (i) the reason the document is not being produced; (ii) the type of document; (iii) the general subject matter; (iv) the date, author and addressee; (v) the relationship of the author and addressee to each other; and (vi) any other description necessary to identify the document and to explain the basis for not producing the document. If a claimed privilege applies to only a portion of any document, only that portion should be withheld and the remainder of the document should be produced. As used herein, "claim of privilege" includes, but is not limited to, any claim that a document or portion thereof either may or must be withheld from production pursuant to any legal doctrine, statute, rule, or regulation.
 - a. Any objections or claims of privilege are waived if you fail to provide an explanation of why full compliance is not possible and a log identifying with specificity the ground(s) for withholding each withheld document or portion thereof prior to the subpoena compliance date.
 - b. In complying with this subpoena, be apprised that (unless otherwise determined by the Committee) the Committee does not recognize: any purported non-disclosure privileges associated with the common law including; any purported privileges or protections from disclosure under the Freedom of Information Act; or any purported contractual privileges, such as non-disclosure agreements.
 - c. Any assertion by a subpoena recipient of any such non-constitutional legal bases for withholding documents or other materials, for refusing to answer any deposition question, or for refusing to provide hearing testimony, shall be of no legal force and effect and shall not provide a justification for such withholding or refusal, unless and only to the extent that the Committee (or the chair of the Committee, if authorized) has consented to recognize the assertion as valid.
18. If the subpoena cannot be complied with in full, it should be complied with to the extent possible, which should include an explanation of why full compliance is not possible.
19. Upon completion of the document production, you must submit a written certification, signed by you or your counsel, stating that: (a) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; (b) documents responsive to the subpoena have not been destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee since the date of receiving the Committee's subpoena or in anticipation of receiving the Committee's subpoena, and (c) all documents identified during the search that are responsive have been produced to the Committee, identified in a log provided

to the Committee, as described in (17) above, or identified as provided in (10), (11) or (12) above.

20. When representing a witness or entity before the Committee in response to a subpoena, document request, or request for transcribed interview, counsel for the witness or entity must promptly submit to the Committee a notice of appearance specifying the following: (a) counsel's name, firm or organization, and contact information; and (b) each client represented by the counsel in connection with the proceeding. Submission of a notice of appearance constitutes acknowledgement that counsel is authorized to accept service of process by the Committee on behalf of such client(s), and that counsel is bound by and agrees to comply with all applicable House and Committee rules and regulations.

DEFINITIONS

The following definitions apply to terms used within the Subpoena, Schedule A, these Instructions, and these 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, interoffice and intra-office communications, electronic mail (“e-mail”), instant messages, calendars, contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, 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, power point presentations, spreadsheets, and work sheets, 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. The term “document” includes all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments to the foregoing, as well as any attachments or appendices thereto. 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 phrase “possession, custody or control” means (a) documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, or representatives acting on your behalf; (b) documents that you have a legal right to obtain, that you have a right to copy, or to which you have access; and (c) documents that have been placed in the possession, custody, or control of any third party.
3. 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 an in-person meeting, by telephone, facsimile, email (desktop or mobile device), text message, instant message, MMS or SMS message, encrypted instant messaging application (e.g., Signal, WhatsApp, Telegram, etc.), Discord message, Google Hangouts message, Microsoft Teams message, Slack message, Skype message, Viber message, regular mail, telexes, releases, one-way communications channels (e.g., Teleporter), or otherwise.

4. The terms “and” and “or” should be construed broadly and either conjunctively or disjunctively as necessary to bring within the scope of this subpoena any information which might otherwise be construed to be outside its scope. The singular includes the plural number, and vice versa. The masculine includes the feminine and neuter genders.
5. The terms “person” or “persons” mean natural persons, firms, partnerships, associations, limited liability corporations and companies, limited liability partnerships, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, other legal, business or government entities, or any other organization or group of persons, and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof.
6. The terms “referring” or “relating,” with respect to any given subject, mean anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any manner whatsoever pertinent to that subject.
7. The term “employee” means agent, borrowed employee, casual employee, consultant, de facto employee, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, contract employee, contractor, or any other type of service provider.
8. 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.
9. The term “you” or “your” means and refers to yourself as a natural person and your firm, corporation, partnership, association, department, or other legal or government entity, including any of its subsidiaries, divisions, branches, or other units thereof, and any of its officers, employees, attorneys, advisors, agents, consultants, staff, contractors, or any other persons acting on your behalf or under your control or direction; and includes any other person(s) defined in the subpoena document request letter.
10. The term “contracts” means and refers to any and all agreements between you and the listed parties that created mutual obligations that are enforceable by law.
11. The term “invoices” means and refers to all documents and communications listing the products or services provided by you to the listed groups and organizations.
12. The term “Authentic Campaigns Inc.” means Authentic Campaigns including (i) its predecessors, successors, subagencies, divisions, affiliates, task forces, partnerships (whether with public and/or private partners), and joint ventures and (ii) any current, past, or future partners, officers, directors, employees, representatives, or agents of any of the above entities.