



U.S. Department of Justice

United States Attorney
District of Connecticut

Connecticut Financial Center
157 Church Street, 25th Floor
New Haven, Connecticut 06510

(203)821-3700
Fax (203) 773-5378
www.justice.gov/usao/ct

February 14, 2014

Custodian of Records
New Friends PAC
22 Meadowlark Drive
Windsor, CT 06095

Re: Non-Disclosure of Subpoena

Dear Custodian of Records:

The attached grand jury subpoena issued on February 14, 2014 is returnable on March 4, 2014 before the federal grand jury sitting that date in New Haven, Connecticut.

The subpoena requests that the custodian of records produce certain documents described in Attachment A to the subpoena. In lieu of appearing before the grand jury, the Custodian of Records may comply with the subpoena by producing the responsive records to Special Agent Matthew McPhillips, FBI, 530 Preston Avenue, Meriden, CT 06450 on or before the grand jury date.

Because this subpoena relates to a federal criminal investigation, you are requested not to disclose the existence of this subpoena or its contents. Disclosure of the subpoena or its contents, may impede an ongoing federal grand jury investigation into the possible commission of a felony, and consequently may interfere with the enforcement of federal law. **Therefore, before you disclose the existence of or the contents of this subpoena, please contact Special Agent McPhillips at (203) 630-5946.**

We also request that the custodian of records at your company complete the attached declaration for any business records that are produced pursuant to this subpoena, to the extent that such records meet the conditions set forth in the declaration—that is, (1) that the records were made at or near the time of the occurrence of the matters set forth in the records, by a person with knowledge of those matters or from information transmitted by such a person, and (2) that these records are made, and are kept, as a regular practice in the ordinary course of business.

Completion of this declaration will significantly reduce the chances that you will be called as a witness at any future trial, where these documents might be offered as evidence.

Very truly yours,

DEIRDRE M. DALY
UNITED STATES ATTORNEY


MICHAEL S. MCGARRY
ASSISTANT UNITED STATES ATTORNEY

MSM:idc

ATTACHMENT A - GRAND JURY N-13-1-33(17)

TO: Custodian of Records
New Friends PAC
22 Meadowlark Drive
Windsor, CT 06095

DOCUMENTS REQUESTED:

For the time period **January 1, 2008 to the present:**

Please provide the following:

1. Any and all documents including, but not limited to, correspondence, memoranda, letters, e-mails, text messages, invoices, contracts, agreements, with any direct mail vendor utilized by New Friends PAC;
2. Any and all documents including, but not limited to, correspondence, memoranda, letters, e-mails, text messages, invoices, contracts, agreements, between all staff at New Friends PAC and George D. Gallo;
3. Any and all documents including, but not limited to, correspondence, memoranda, letters, e-mails, text messages, invoices, contracts, agreements, between all staff at New Friends PAC and The Vinco Group, LLC;
4. Any and all documents including, but not limited to, correspondence, memoranda, letters, e-mails, invoices, contracts, agreements, with Direct Mail Systems, Inc.; and
5. Any and all documents including, but not limited to, correspondence, memoranda, letters, e-mails, invoices, contracts, agreements, with King Strategic Communications.

Records are requested in the form of electronic media. Please see Instructions for Production of Electronically Stored Records.

Note: Please include a copy of this subpoena with any materials or records produced. In lieu of your personal appearance before the Grand Jury, these records may be provided to Special Agent Matthew McPhillips, FBI, 530 Preston Avenue, Meriden, CT 06450 tel: 203-630-5946 on or before the Grand Jury date.

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* _____
was received by me 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: _____

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:

DECLARATION

I, _____, declare under penalty of perjury as follows:

1. I am employed by _____ (hereinafter, the "business"), and my official title is _____. I am the custodian of records for the documents subpoenaed by the Federal Grand Jury N-13-1 which is currently pending in the District of Connecticut. I am familiar with my company's record keeping practices. I am submitting this Declaration pursuant to Rule 902(11) of the Federal Rules of Evidence.

2. I certify that each of the records attached hereto is a duplicate of the original records in my company's custody.

3. I further certify that the records enclosed with this Declaration were (A) made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters, (B) kept in the course of the business's regularly conducted activity, and (C) made by the business's regularly conducted activity as a regular practice.

I declare under penalty of perjury as provided by 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this ____ day of _____, 2014.

Custodian of Records



United States Department of Justice

United States Attorney
District of Connecticut

INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY (DIGITAL) STORED RECORDS

This document details the data formatting specifications required for data submitted to the U.S. Attorney's Office (USAO) in response to litigation. The Government currently uses Concordance (ver 10.06) and IPRO (ver 8.6).

ANY VARIANCE FROM THESE STANDARDS MUST BE PRE-APPROVED.

A. **MEDIA**

All data and image deliveries must be made on CD, DVD, or USB 2.0 external hard drive.

B. **DATA FORMAT**

Data should be delivered in one of two formats:

1. As a Concordance database (.dcb)

- ❖ In most instances, the StartBates should be the Image Key field unless another field has been designated the key field by the Government.
- ❖ All fields should be indexed.

Note: If this method is chosen, and there will be more than one production, please confirm the database fields and structure remain consistent between data deliveries.

2. As an ASCII delimited text file (.dat)

If this method is chosen, please adhere to the following:

- ❖ The first line of the text file must contain the field names.
- ❖ The delimiters used should be the Concordance standards, of: comma (ASCII character 020), quote (ASCII character 254), and newline (ASCII character 174).
- ❖ Produce a page header indicator in the following format, <<batesno>>, on a separate line for every page of OCR.

C. DELIVERED FIELDS

The database or load file provided must contain, at minimum, the first and last Bates number for each document, and all applicable OCR text. OCR text should be incorporated directly in either the Concordance database or the ASCII load file, and not delivered in separate text files.

D. IMAGE/CROSS REFERENCE FILE GUIDELINES

I. IMAGE FORMAT

1. TIFF – Single page (Preferred) OR

- ❖ Documents should be scanned at 300 dpi, as single-page CCITT Group IV TIFF files. TIFF file names should match the assigned Bates number of the underlying document page, should be unique, and sequentially numbered. PDF files will be accepted only after a consultation between the provider and USAO technical support staff. Multi-page TIFF files are strongly discouraged.
- ❖ Bates numbers should be electronically “endorsed” onto images. The file name assigned to the image should match the underlying document’s Bates number. Bates numbers should be alpha- numeric, with the numeric portion of the stamp being “zero-filled”. As an example, an assigned Bates numbered series of documents such as “ABC1”, “ABC2”, “ABC3” would be unacceptable, whereas “ABC000001”, “ABC000002”, “ABC000003” is preferred.
- ❖ Images should be placed on delivered media in a master folder named XIMAGES.

2. PDF – Multi-page (text searchable)

II. CROSS-REFERENCE FILE

1. Tiff files must be accompanied with an image “cross-reference file”, preferably in IPRO® .lfp format. This file associates each bates number with its corresponding single-page TIFF file name and indicates its location on the media provided. The file should contain one line for every page in the collection, and must contain the document Bates number and the full DOS path to the image, beginning with the media volume. Below is a sample IPRO file:

```
IM,ABC-000001,D,0,@VOL01;IMG_0000001;ABC-000001.tif;2,0
IM,ABC-000002,,0,@VOL01;IMG_0000001;ABC-000002.tif;2,0
IM,3542-S-000001,D,0,@VOL01;IMG_0000001;3542-S-000001.tif;2,0
IM,3542-S-000002,,0,@VOL01;IMG_0000001;3542-S-000002.tif;2,0
IM,3542-S-000003,,0,@VOL01;IMG_0000001;3542-S-000003.tif;2,0
```

E. NATIVE FILES

With the exception of spreadsheets, electronic files should not be provided in their original or "native" format, but should be put through an electronic conversion (e-conversion) process, in which single-page TIFF images are created from all underlying document pages, and all text and applicable metadata from these files is extracted. Data, images, and image cross-reference files resulting from this process should follow the formatting specifications detailed in the sections above.

Spreadsheets (such Microsoft Excel or Lotus 1-2-3) should be provided in both e-converted and native format.

F. SECURITY

All submissions of electronic data to the USAO must be free of computer viruses. In addition, any passwords protecting files or media must be removed or provided.

Rev. October 2013

UNITED STATES DISTRICT COURT

for the
District of Connecticut

GJ N-13-1-33(17)
SA Matthew McPhillips, FBI

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Custodian of Records
New Friends PAC
22 Meadowlark Drive
Windsor, CT 06095

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: Robert N. Giaimo Federal Building 150 Court Street, Room 125 New Haven, CT 06510	Date and Time: Grand Jury Room March 4, 2014 at 9:00 a.m.
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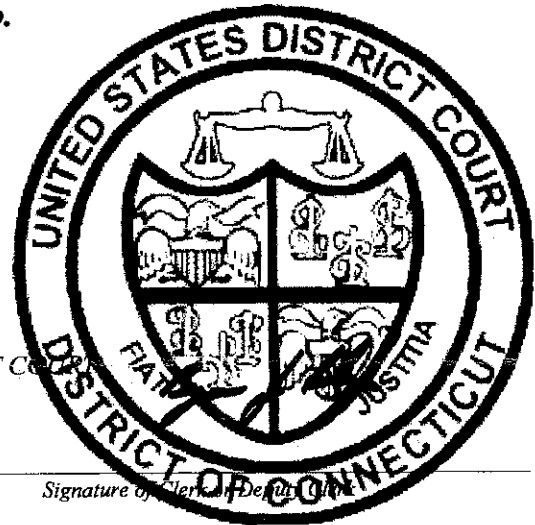
You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

See Attachment A hereto.

Note: Please include a copy of this subpoena with any materials or records produced. In lieu of personally appearing before the Grand Jury, these records may be provided to Special Agent Matthew McPhillips, FBI, 530 Preston Avenue, Meriden, CT 06450 tel: 203-630-5946, on or before the Grand Jury date.

Date: 02/14/2014

CLERK OF COURT



Signature of Clerk of Court

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Michael S. McGarry, Assistant United States Attorney
U.S. Attorney's Office, District of Connecticut
157 Church Street, 25th Floor
New Haven, CT 06510 Tel. 203-821-3700 Control No. 102