

UNITED STATES DISTRICT COURT

for the

Northern District of California

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Telugu Association of North America
26233 Taft Road Novi, MI 48374

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: United States District Courthouse - San Jose 280 S. First Street, Room 2115, 2nd Floor, San Jose, CA 95113	Date and Time: December 26, 2024
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You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

SEE ATTACHMENT. Provide all records in electronic format only.

Voluntary compliance with this federal grand jury subpoena will be deemed satisfactory when the information requested is provided to the agent listed below and no appearance will be necessary.

MAIL DOCUMENTS TO:

Federal Bureau of Investigation (FBI)
Attention: Special Agent Kathryn Taylor
1919 South Bascom Avenue, Suite 400
Campbell, California 95008
Telephone: (408) 706-6012 kataylor3@fbi.gov

Date: December 12, 2024



CLERK OF COURT


 Mark B. Busby
 Signature of Clerk or Deputy Clerk

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

Michael Pitman, AUSA
U.S. Attorney's Office 150 Almaden Blvd., Suite 900 San Jose, CA 95113
408-535-5061
michael.pitman@usdoj.gov *Michael Pitman*

ATTACHMENT A

SUBPOENA RECIPIENT

Telugu Association of North America
26233 Taft Road
Novi, MI 48374

INSTRUCTIONS

A. This subpoena calls for the production of all responsive documents in the possession, custody, or control of Recipient without regard to the physical location of the documents, and without regard to whether they were prepared by or for Recipient.

B. *Production of Paper Documents.* The grand jury would prefer that all documents be produced in an electronic or scanned form rather than in paper. If this is not possible, and documents are provided in a paper form, please keep copies of any documents that you wish to retain for your records and produce to the grand jury the original documents. All documents, whether in electronic, scanned, or paper form, should be sequentially numbered (bates numbered) with a two- or three-letter prefix identifying the Recipient. The prefix and sequential number should appear in the lower right-hand corner of each page, in a location that does not obscure any information on the document. Each page produced should be numbered in accordance with the preceding instruction, not just the first page of a document.

C. *Preservation of Electronic Data.* As used in this subpoena, the definition of "document" includes data stored in any electronic form. Recipient should immediately take the following steps to ensure that it preserves all types of electronic data in any location within its computer systems that may be responsive to the subpoena.

1. The following types of electronic data should be preserved, in accordance with the steps set forth below:

a. All electronic mail, information about emails (including message contents, header information, and logs of email system usage), and any attachments containing information responsive to the subpoena;

b. All other electronic communications (including but not limited to texts, internal and external messaging application messages and logs, and retained audio or voicemail recordings) containing information responsive to the subpoena;

c. All electronic calendars and scheduling programs containing information responsive to the subpoena;

d. All user-created files (including but not limited to word processing files, spreadsheets and slide presentations) containing information responsive to the subpoena;

- e. All databases containing information responsive to the subpoena, such as sales, pricing, customer, accounting, billing and other financial information;
- f. All logs of user activity on computer systems that may have been used to process or store electronic data containing information responsive to the subpoena; and
- g. All other electronic data containing information that is responsive to the subpoena.

2. *Online Data Storage, Servers.* With regard to Recipient's servers, do not modify or delete any electronic data existing as of the date of the subpoena that meet criteria set forth above, unless a true and correct copy of each such electronic data file has been made and steps have been taken to ensure that this copy will be preserved and accessible for purposes of this grand jury investigation.

3. *Offline Data Storage, Backups, Archives, other Removable Media.* With regard to all electronic media used for offline data storage, including but not limited to magnetic tapes and cartridges and other media that, at the date of this subpoena, contained any electronic data meeting the criteria listed in Paragraph C.1, above, stop any activity that may result in the loss of such electronic data, including rotation, destruction, overwriting and/or erasure of such media in whole or in part. This request is intended to cover all removable electronic media used for data storage in connection with Recipient's computer systems, including magnetic tapes and cartridges, magnetic or optical discs, external data storage drives, and all other media, whether containing active data, backup data, archived data, or any other electronic data, for all of Recipient's computer systems.

4. *Replacement of Data Storage Devices.* Do not dispose of any electronic storage devices and media that may be replaced due to failure and upgrade at reasons that may contain electronic data meeting the criteria above.

5. *Local User Hard Drives on Personal Computers, Hand-Held Devices.* With regard to electronic data meeting the criteria listed in Paragraph C.1, above, that existed on personal stand-alone computers (including desktops, laptops, and home computers used to conduct your company's business) and hand-held devices (including BlackBerrys, Palm Pilots, and similar devices) as of the date of this subpoena, do not alter or erase this electronic data, and do not perform other procedures (such as data compression and disk de-fragmentation, optimization routines, or reassignment of hard drives), which may affect this data, unless a true and correct copy has been made of these active files. Copies have been made of all directory listings (including system files) for all directories and subdirectories containing these files, and arrangements have been made to preserve copies during the pendency of this grand jury investigation.

6. *Custom Designed Programs and Databases.* Preserve copies of all custom application programs and custom database programs that are used to process electronic data responsive to this subpoena.

7. *Log of System Modifications.* Maintain an activity log to document modifications made to any electronic data processing system that may affect the system's capability to process any electronic data meeting the criteria listed above, regardless of whether these modifications were made by employees, contractors, vendors and any other third parties

8. If you wish, please contact the attorneys for the government listed herein to discuss the Recipient's obligation to preserve electronic data responsive to this subpoena.

D. *Format Requirements.* All responsive data and documents stored electronically or scanned documents should be produced in an electronic format, by secure file transfer, on an optical disc, or on an electronic storage device such as a hard drive, as follows:

Images. Documents should be produced as Group IV single page TIFF format files, imaged at 300 dpi. Each TIFF file shall be named with a unique file name matching the Bates number labeled on the corresponding page. The TIFF files shall be grouped into folders; there shall not be a separate folder created for each document.

Image Load Files. Documents should be accompanied by ".opt" and ".dat" image load files (Opticon cross reference file and Concordance load file).

Document Text. For scanned paper documents or documents originally stored as images, please provide OCR text. For documents stored as native electronic files produced without redactions, the extracted text from each document shall be provided. For documents that were originally stored as native electronic files and that have redactions, OCR text from the redacted images associated with each document shall be provided. Any redacted, privileged material will be clearly labeled to show the redactions on the TIFF image. Any OCR text or extracted text, the text shall be provided in a separate ".txt" file named with the beginning Bates number of the document.

Special File Types. Files that do not lend themselves to TIFF file format (e.g., Excel or other spreadsheet programs) may be produced in native format and named with a unique file name matching the Bates number of the corresponding slip-sheet that will be included as a placeholder in the imaged TIFF format files (e.g., "ABC00001.xls"). The slip-sheet placeholder in the imaged TIFF format files shall indicate that the document is being provided in native format (e.g., "Produced in Native Format"). For database data responsive to this subpoena, please provide such data in a flat file, delimited ASCII format file. The first line of the file should show the column headers for each field of data included. Please provide us with the delimiters used between fields, between entries within a field, and for the end of record marker

Document Metadata. Non-privileged extracted metadata for each document shall be provided, where available, in the form of a Concordance delimited ".dat" file and include the following fields:

Beg_Bates	The bates label of the first page of the document
End_Bates	The bates label of the last page of the document

Beg_Attach	The bates label of the first page of a family of documents (e.g., email and attachment).
End_Attach	The bates label of the last page of a family of documents.
Subject	The subject of an email or the filename of an attachment or standalone e-file.
Time_Zone	The time zone used to process the document.
Sent_Date	For email, the sent date of the message.
Sent_Time	For email, the sent time of the message.
Create_Date	For e-files or attachments, the document's creation date or operating system creation date.
Create_Time	For e-files or attachments, the document's creation time or operating system creation time.
Modified_Date	For e-files or attachments, the document's last modified date or operating system last modified date.
Modified_Time	For e-files or attachments, the document's last modified time or operation system last modified time.
Author	The author of a stand-alone e-file or attachment.
From	The sender of an email message.
To	The recipient(s) of an email message, in a semi-colon delimited multi-value list.
CC	The copyee(s) of an email message, in a semi-colon delimited multi-value list.
BCC	The blind copyee(s) of an email message, in a semi-colon delimited multi-value list.
Custodian	The custodian in whose file the document was found.

E. *Security.* All submissions of electronic data must be free of computer viruses and malware. In addition, any passwords protecting documents or files must be removed or led when responding to the subpoena.

F. *Claims of Privilege.* For each document or portion thereof withheld under a claim of privilege, Recipient shall provide a statement including (1) the basis on which the privilege is claimed; (2) the document request in this subpoena to which the document is responsive; (3) identification of the withheld document or portion of document by author, Recipient, date, number of pages, and subject matter; (4) each person to whom the withheld material was sent; and (5) each person to whom the withheld material or its contents, or any part thereof, were disclosed. Any document or part of a document withheld under a claim of privilege must be preserved.

G. If any portion of any document is responsive to the subpoena, then the entire document must be produced, including all supporting, underlying, or explanatory documents and all attached, annexed, or appended documents. If a document contains privileged material, the entire document shall be produced, with the privileged material redacted and documented in the manner set forth above.

H. Use of the singular or the plural in this subpoena of documents should not be deemed a limitation, and the use of the singular should be construed to include, where appropriate, the plural. The conjunctive form "and" and the disjunctive form "or" are mutually interchangeable.

and encompass each other. "Any" and "all" are mutually interchangeable and encompass each other. "And," "or," "any," and "all" as used herein are terms of inclusion and not exclusion.

I. Any agreement or stipulation to modify, limit, or otherwise amend the scope of this subpoena shall be set forth or confirmed in writing.

NOTICE CONCERNING OBSTRUCTION

Any person who withholds, alters, or destroys documents demanded by this subpoena, removes documents to outside the jurisdiction of the United States, or unjustifiably refuses to produce any demanded document that is within such person's possession, custody, or control may be subject to criminal prosecution for obstruction of justice, contempt of court, or other federal criminal violations. Conviction of any of these offenses is punishable by fine, imprisonment, or both.

RELEVANT TIME PERIOD

The relevant time period covered by this subpoena is from January 1, 2019 to the date of the subpoena, unless another time period is noted in the individual requests for documents included below.

REQUESTS FOR DOCUMENTS

1. Documents identifying all individuals or entities who served as officers and/or directors of the Telugu Association of North America ("TANA") at any time during the relevant time period, including rosters and organizational charts organized by section, office, division, or group including the names of all such individuals or entities, their titles, the respective dates of their positions, the locations at which they served, last address, telephone number, email address, and committee, subcommittee, or working group assignments.
2. Documents identifying all individuals employed by TANA at any time during the relevant time period, including rosters and organizational charts organized by section, office, division, or group including the names of all such individuals or entities, their titles, the respective dates of their positions, the locations at which they served, last known address, telephone number, email address, and committee, subcommittee, or working group assignments.
3. Records of meetings of the board of directors of TANA, and any subcommittee of the board, during the relevant time period, including minutes, meeting packages, agenda, board materials and reports, presentations, resolutions, and documents reviewed or considered at or prior to any meeting.
4. Records of meetings of executives of TANA, including executive committees and any subcommittees, during the relevant time period, including minutes, meeting packages, agenda, materials and reports, presentations, resolutions, and documents reviewed or considered at or prior to any meeting.

5. Quarterly and annual financial statements for TANA for the relevant time period.
6. Written policies of TANA relating to accounting, financial reporting, audits, internal accounting controls, and preparation of financial statements.
7. Records regarding the retention and work performed by any auditors, bookkeepers, and/or tax return preparers for TANA during the relevant time period.
8. All workpapers of any auditors, bookkeepers, and/or tax return preparers for TANA during the relevant time period, retained copies of all federal and state income, and payroll tax returns, all records used in or resulting from the preparation of all federal and state income, and payroll tax returns.
9. Documents sufficient to locate every machine (desktop computer, laptop computer, telephone, etc.) used by any officer, director, or employee to conduct TANA business during the relevant time period.
10. Account statements for any financial account which received funds belonging to TANA, or distributed funds for TANA's benefit, at any time during the relevant time period.
11. List of all donations received by TANA during the relevant time period, either directly or indirectly, including any donation received from any matching program.
12. List of all payments made by TANA to any individual during the relevant time period, either directly or indirectly, including the identity of the ultimate beneficiary of the payment, the purpose of the payment, and the account used to make the payment.

CONTACT INFORMATION

If you wish to comply voluntarily rather than appear before the Grand Jury, please produce the responsive documents on or before the return date of the subpoena by delivering the documents to the federal agents at the addresses displayed below:

Federal Bureau of Investigation (FBI)
Attention: Special Agent Kathryn Taylor
1919 South Bascom Avenue, Suite 400
Campbell, California 95008
Telephone: (408) 706-6012
kataylor3@fbi.gov

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Alternate point of contact:
IRS Criminal Investigations
Attn: Lisa Sasso, Special Agent
450 Golden Gate Avenue, 7th Floor Room 2506
San Francisco, CA 94102
(415) 720-8391
Lisa.Sasso@ci.irs.gov

Once the records or items demanded by the attached subpoena are no longer needed by the FBI and/or United States Attorney's Office for investigation or prosecution purposes, the records or other items will be destroyed by the FBI unless the FBI is otherwise advised that the records should be returned to the serviced company.

If you have questions about this subpoena, please contact the Special Agents using the contact information displayed above, or Assistant United States Attorney Michael G. Pitman at (408) 535-5040.

