SUBPOENA FOR DOCUMENTS AND INFORMATION

To: Protect Utah PAC
c/o Jason Powers, Registered Agent
520 North Main Street #555
Heber City, UT 84032

Pursuant to the authority of the Special Investigative Committee of the Utah House of Representatives pursuant to Utah Code Ann. §§ 36-14-1 *et seq.*, you are hereby commanded to produce by Five O'Clock p.m. (5:00 p.m.) on November 25, 2013 the documents and information set forth herein in Schedule A. The documents and information sought herein should be delivered to the Special Investigative Committee, c/o John L. Fellows, General Counsel, Office of Legislative Research and General Counsel, Utah State Capitol Complex, House Building Suite W210, Salt Lake City, UT 84114.

Any contumacy or failure to obey this subpoena may subject you to sanctions and penalties under the law.

Given under my hand, by authority vested in me, this 7th day of November, 2013.

Representative James A. Dunnigan
Chairman
Special Investigative Committee of the Utah House of Representatives

SCHEDULE A

Documents and Information to be Produced

1. All documents referring or relating to John Swallow or John Swallow's Campaign.

2. All documents referring or relating to fundraising strategy for John Swallow's Campaign.

3. All documents referring or relating to fundraising efforts undertaken for John Swallow's Campaign including, but not limited to, solicitations of donors or communications with John Swallow's Campaign referring or relating to fundraising efforts.

4. All communications involving any personnel of Protect Utah PAC or anyone communicating on its behalf and John Swallow.

5. All documents referring or relating to any contribution, payment or expenditure made to or on behalf of John Swallow's Campaign, John Swallow, or any person or entity for the direct or indirect benefit of John Swallow, by any person or entity, regardless of whether such contribution, payment or expenditure was required to be publicly disclosed, including, but not limited to, financial records, bank statements, receipts, acknowledgements, wire records, cancelled checks or records of electronic payment reflecting a contribution, payment or expenditure made.

6. All documents referring or relating to any service or thing of value provided directly or indirectly to John Swallow's Campaign, John Swallow, or any person or entity for the direct or indirect benefit of John Swallow, by any person or entity, regardless of whether such service or thing of value was required to be publicly disclosed, including, but not limited to, financial records, bank statements, receipts, acknowledgments, wire records, cancelled checks or records of electronic payment reflecting a service or thing of value provided.

Instructions

1. The time period applicable to these requests is December 1, 2009 to the date of this subpoena.

2. The documents and information subpoenaed includes all that is in your custody, control or possession, or within your right of custody, control or possession.

3. To the extent practicable, documents shall be produced in a searchable electronic format (such as delimited text with images and native files, or searchable PDF format). Audio and video files shall be produced in their native format. All materials provided in response to this subpoena shall contain a unique identifying number, irrespective of format.

Definitions

1. "**Communication**" means the transmission of information to an identified person or about an identified subject in any format or medium, including, but not limited to, the following: hard copy documents; electronic documents and all other electronically stored information, including, but not limited to, electronic mail, text messages or instant messages; photographs; or audio or video recordings.

2. "**Contribution**" means any type of contribution set forth in Utah Code Ann. § 20A-11-101(5).

3. "**Document**" means any written, recorded or graphic matter in any format or medium, including, but not limited to, the following: hard copy documents; electronic documents and all other electronically stored information, including, but not limited to, electronic mail, text messages or instant messages; photographs; or audio or video recordings.

4. **"John Swallow's Campaign"** means Mr. Swallow's campaign for the 2012 Utah Attorney General election, Friends of John Swallow, any individual affiliated with Mr. Swallow's campaign for the 2012 Utah Attorney General election or Friends of John Swallow, including, but not limited to, staff or consultants, or Mr. Swallow in his individual capacity.

5. "**Referring or relating to**" means pertaining in any way to the identified person or subject.