

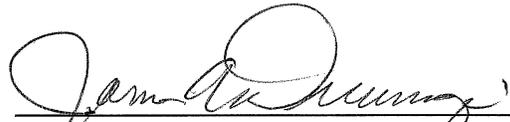
**SUBPOENA FOR DOCUMENTS AND INFORMATION**

To: Office of the Utah Attorney General  
Utah State Capitol Complex  
350 North State Street, Suite 230  
Salt Lake City, UT 84114-2320

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 7<sup>th</sup> 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 travel by John Swallow including, but not limited to, travel reservations, itineraries or schedules, reasons for travel, receipts or reimbursements for travel expenses, and reports of amounts incurred for travel.
2. All public or non-public schedules or itineraries for John Swallow.
3. All documents provided by John Swallow to federal investigators in response to the federal grand jury subpoena served on him in 2011 in the matter involving Worldwide Environmental Products, Inc. including, but not limited to, any cover letter or memorandum transmitting such documents.
4. All documents including, but not limited to, case files of the Office of the Attorney General, referring or relating to any of the following:
  - a. Marc Sessions Jenson or any case referring or relating to him including, but not limited to, *State v. Marc S. Jenson*, case number 111906135 in the Third District Court of Utah;
  - b. The Mount Holly Club development;
  - c. Tim Lawson;
  - d. Jeremy Johnson or any entity affiliated with him including, but not limited to, I Works, Inc.;
  - e. Worldwide Environmental Products, Inc.;
  - f. Timothy or Jennifer Bell, or any case referring or relating to either of them including, but not limited to, *Bell et al v. Countrywide Bank NA et al*, case number 2:11-cv-00271-BSJ in U.S. District Court for the District of Utah.
5. All documents referring or relating to any fundraiser held for John Swallow's Campaign by Timothy or Jennifer Bell, or any individual or entity affiliated with either of them including, but not limited to, BellMed Resources LLC or TriBell Medical LLC, and all documents referring or relating to the receipt or disclosure by John Swallow's Campaign of any payment, contribution or in-kind contribution made by Timothy or Jennifer Bell or any individual or entity affiliated with either of them including, but not limited to, BellMed Resources LLC or TriBell Medical LLC.
6. All documents referring or relating to the policy or standards of the Office of the Attorney General for determining whether recusal of Office personnel from Office business is desirable or required.

7. All communications between John Swallow and Chris Earl since January 1, 2012.
8. All communications between John Swallow and any personnel of the Utah Department of Technology Services or any personnel of Tempus Nova, Inc. referring or relating to the migration of Office of the Attorney General email from Novell GroupWise to Google Mail.
9. All communications from the Utah Department of Technology Services following the migration in 2012 from Novell GroupWise to Google Mail referring or relating to whether that migration was or was not successful.
10. All requests received by the Office of the Attorney General in 2012 pursuant to the Government Records Access and Management Act.
11. All litigation holds or document hold notices issued in 2012 by the Office of the Attorney General to Office personnel.

## **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. **“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.
3. **“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.
4. **“Referring or relating to”** means pertaining in any way to the identified person or subject.