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May 31, 2022

Rep. Bennie G. Thompson, Chairman
January 6th Select Committee
1540A Longworth House Office Building
Washington DC 20515

RE: Subpoena to Pennsylvania State Senator Douglas V. Mastriano

Dear Rep. Thompson:

I represent Pennsylvania State Senator Douglas V. Mastriano and am writing in response to the subpoena issued by the January 6th Select Committee to my client, which is dated February 15, 2022, but which was served upon my client on March 2, 2022.

The Subpoena requested my client produce certain documents and communications in his possession, custody, or control, with the caveat that you “do not seek information from you that is related to official actions that you took as an elected lawmaker.” We are producing the following records to you, which are available for download at: <https://www.dropbox.com/t/zkQFV1bSkhvEucFq>.

In response to the numbered requests, please see below:

1. All documents and communications referring or relating in any way to plans, efforts, or discussions regarding challenging, decertifying, overturning, or contesting the results of the 2020 Presidential election in Pennsylvania, any other state, or nationally.

Response: See Folders 1 and 2.

2. All documents and communications relating in any way to the security of election systems in the United States.

Response: See Folders 1, 2, and 3.

3. All documents and communications with members of Congress, state or local officials, White House officials/employees, representatives of the Trump reelection campaign, and national or local party officials, relating to election fraud or malfeasance, as well as delaying or preventing the certification of the election in Pennsylvania, in any other state, or nationally.

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One World Trade Center, Suite 8500, New York, NY 10007



Response: See Folder 3.

4. All public statements, press releases, mass emails, fundraising solicitations, videos, letters, or other documents, including all drafts of such documents, that you, or someone on your behalf, released between November 3, 2020 and January 20, 2021 addressing delaying or preventing the certification of the election in Pennsylvania, in any other state, or nationally.

Response: See Folders 1, 2, 3, 4, and 5.

5. All documents and communications relating in any way to purported alternate sets of electors casting electoral votes in the fall 2020 election, including but not limited to the drafting of a purported certificate of the votes of any alternative slate of electors, the organization of any meeting of electors for Donald Trump and Michael Pence on December 14, 2020, as well as the potential or purportedly actual selection of an alternate slate of electors by any state legislature or executive.

Response: See Folders 3 and 5.

6. All documents and communications referring or relating in any way to John Eastman, Mark Martin, Rudolph Giuliani, Boris Epshteyn, or Jenna Ellis.

Response: See Folders 1 and 2.

7. All documents and communications relating in any way to protests, marches, public assemblies, rallies, or speeches in Washington, D.C., on or about January 6, 2021 (the "Washington Rally").

Response: See Folders 1 and 2.

8. All documents referring or related to the financing or fundraising associated with the Washington Rallies and any individual or organization's travel or accommodation in Washington, D.C., to attend or participate in the Washington Rallies.

Response: See Folder 6.

9. All documents and communications referring or related to any buses, motorcoaches, or other ground transportation that were chartered, leased, or rented by you individually, through your senatorial campaign, by Turning Point USA or any Turning Point entity, or by any other related person/entity known by you, for transportation to the Washington Rallies. This should include any communications, contracts, lease agreements, or other forms of written agreements, payment information and written communications with any bus companies, or with any individuals who made such arrangements with bus companies. This also includes any advertisements, flyers, social media posts, or other communications soliciting passengers for any ground

transportation to the Washington Rallies, along with any passenger manifests created, kept, or maintained.

Response: See Folder 7.

10. All documents and communications related to the January 6, 2021, attack on the U.S. Capitol.

Response: See Folder 6.

Please let me know if you need any further information.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Timothy C. Parlatore". The signature is written in a cursive, flowing style with a long horizontal flourish extending to the right.

Timothy C. Parlatore, Esq.