September 28, 2023

Dear [Name]

The Committee on Oversight and Accountability and the Committee on the Judiciary (collectively “the Committees”) are subpoenaing certain financial records in the possession, custody, or control of [Name] and [Name]. These subpoenas are being issued at the bank’s request and pursuant to our authority as the Chairmen of the Committees under Rule XI, clause 2(m)(1)(B) of the Rules of the House of Representatives, Rule 12(g) of the Oversight Committee’s Rules, and Rule IV(a) of the Judiciary Committee’s Rules.

The Committees are seeking records related to Robert Hunter Biden (Hunter Biden), James Biden, Eric Schwerin, and entities associated with them. As part of its investigation, the Oversight Committee has reviewed bank records of individuals and entities associated with the Biden family as well as other evidence. This review uncovered a pattern of financial complexity. As detailed in the Impeachment Memorandum and the Oversight Committee’s Bank Memoranda, the Biden family used corporate bank accounts of third-party associates to receive wires from foreign companies and foreign nationals. The Biden business associates then dispersed money to various Biden family members in incremental payments over time.

While much of this money went to Hunter Biden’s professional corporation, Owasco P.C., and his other bank accounts, other Biden family members and their companies received significant payments as well. For instance, the Oversight Committee has confirmed that


2 Id.
Robinson Walker, LLC received payments from foreign companies and individuals and then made payments to Owasco, P.C., other Hunter Biden bank accounts, Hallie Biden, and JBBSR, Inc., a corporate account associated with James Biden. The Oversight Committee has traced payments from Burisma and entities related to CEFC, a Chinese energy company, to the bank accounts of Biden business associates, and then money was sent to accounts belonging to Hunter Biden. The Committees are concerned that Hunter Biden and other Biden family members sought to conceal the source of foreign income by having lucrative wires sent to Biden associates’ accounts instead of their own bank accounts and elsewhere. We believe these records will provide insight as to where the foreign money was finally sent.

On September 12, 2023, Speaker Kevin McCarthy directed the Committees to open a formal impeachment inquiry into President Joe Biden. Evidence shows that Joe Biden was aware of at least some of his family’s business ventures and sought to influence potential business deals that financially benefited his family. Indeed, a Biden business associate, Devon Archer, testified how the Biden “brand” was used in retaining business, and that Joe Biden met with some of the foreign nationals who paid his family. Accordingly, the Committees seek additional information regarding the use and ultimate destination of these funds given Joe Biden’s involvement with individuals who were paying these companies (that are associated with his family) and ultimately his family members themselves. The subpoenaed bank records will help the Committees determine whether Joe Biden abused his office by selling access and/or receiving payments or other benefits in exchange for official acts, which is a critical aspect of the Committees’ impeachment inquiry.

The records sought by this subpoena will also assist in efforts to craft legislative solutions aimed at deficiencies that have been identified in the current legal framework regarding ethics laws and disclosure of financial interests related to the immediate family members of Vice Presidents and Presidents—deficiencies that may place American national security and interests at risk. These requested records should provide the Committees with unique and particularized information critical to Congress’s investigation of a systemic failure to protect against potential malign foreign interactions with family members of senior elected officials. Specifically, the Committees are concerned that foreign nationals and foreign companies appear to have sought access and influence by engaging in lucrative business relationships with high-profile political figures’ immediate family members.

The Committees are also concerned about the national security implications of a President’s or Vice President’s immediate family members receiving millions of dollars from foreign nationals or companies without any oversight. Current financial disclosure laws and regulations do not require non-dependent family members to provide any information to the public. Meaningful reforms to government ethics and disclosure laws are therefore being

---

1 H. Comm. on Oversight & Accountability. From Maj. Comm. staff to Comm. Members. Re: New Evidence Resulting from the Oversight Committee’s Investigation into the Biden Family’s Influence Peddling and Business Schemes; Memorandum (May 10, 2023), at 31-32.
2 Transcribed interview of Devon Archer, H. Comm. on Oversight & Accountability (July 31, 2023), at 29.
explored that will provide necessary transparency into a President’s or Vice President’s immediate family members’ income, assets, and financial relationships with companies. In particular, the Oversight Committee intends to develop legislation that would strengthen reporting requirements related to certain foreign transactions involving senior elected officials’ family members and implement financial disclosure laws that shed light on ownership of opaque corporate entities. Moreover, to prevent financial transactions from being structured in a way to evade disclosure, the Oversight Committee is examining whether certain reporting requirements, including any new reporting requirements for senior elected officials’ family members, should extend for a period of time after a President or Vice President leaves office.

In addition, ways to strengthen the Bank Secrecy Act and anti-money laundering laws are being considered, including by analyzing whether financial institutions have the available tools and support from federal agencies to thwart illegal money laundering and foreign corruption activity. In particular, the Oversight Committee is evaluating whether Suspicious Activity Reports generated by personal and corporate bank accounts associated with a President’s or Vice President’s immediate family members should undergo a more rigorous banking compliance process, receive expedited review by law enforcement, and be disclosed to Congress, under certain circumstances, given the potential corruption and risks to national security.

We aim to draft legislation that provides more transparency to the American people, deters foreign interests from attempting to obtain influence over and access to the highest levels of the federal government by entering into business deals with Presidential or Vice-Presidential family members, discourages such family members from profiting from their relative’s public service, and ensures the nation is safe from our foreign adversaries.

In short, the records sought by these subpoenas are critical to both the impeachment inquiry and to further the Committees’ purposes. As Chairmen of the Committees, we urge you to cooperate speedily and in good faith with these subpoenas. If you have any questions regarding this subpoena, please coordinate with Oversight Committee staff at (202) 225-5074 and Judiciary Committee staff at (202) 225-6906.

Sincerely,

James Comer
Chairman
Committee on Oversight and Accountability

Jim Jordan
Chairman
Committee on the Judiciary
SUBPOENA

BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE
CONGRESS OF THE UNITED STATES OF AMERICA

To:

You are hereby commanded to be and appear before the
Committee on Oversight and Accountability

of the House of Representatives of the United States at the place, date, and time specified below.

☐ to produce the things identified on the attached schedule touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of production: 2157 Rayburn House Office Building, Washington, D.C. 20515
Date: 10/12/23 Time: 5:00 PM (EST)

☐ to testify at a deposition touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony:
Date: _________________________ Time: _________________________

☐ to testify at a hearing touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony:
Date: _________________________ Time: _________________________

To any authorized staff member or designated official with the United States Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, D.C. this 28 day of September, 2023.

Attest: Kevin F. McCulley
Clerk

Chairman or Authorized Member
Schedule to Subpoena

In accordance with the attached Schedule instructions, the custodian of records of [redacted] is required to produce the following documents and communications that are in the Bank's possession, custody, or control, from January 1, 2014 to present, in unredacted form:

1. All financial records, including but not limited to account statements, correspondent bank records, deposits, direct deposits, checks, cashier checks, wire transfers, electronic transfer payments, credit card and debit card records, loan documents and supporting documentation, all records regarding the opening of the accounts, signature cards, copies of identification presented by the account holder or any other signatory, account closing documents, and "know your client" (KYC) and due diligence documents, for the following individuals and entities, as well as all corporate entities affiliated with or linked to the following individuals and entities:
   a. Robert Hunter Biden
   b. Owasco, P.C.
   c. Owasco, LLC
   d. Skaneateles
   e. Eric Schwerin
   f. James Biden
   g. Lion Hall Group, LLC
   h. JBBSR, Inc.

For business accounts, this should also include any corporate identification documents, documents involving beneficial owners, and documents and communications related to the purpose of the business account.

2. Documents sufficient to show all accounts opened and closed by the individuals and entities listed in 1(a)-1(h) above and the corporate entities affiliated with or linked to them.

3. All documents and internal and external communications referring or relating to any person named in 1(a)-1(h) above or any corporate entity affiliated with or linked to any such person, including communications and documents related to KYC and due diligence communications regarding the individuals and entities named above.
September 28, 2023

Dear [Redacted]:

The Committee on Oversight and Accountability and the Committee on the Judiciary (collectively "the Committees") are subpoenaing certain financial records in [Redacted] possession, custody, or control. These subpoenas are being issued at the bank’s request and pursuant to our authority as the Chairmen of the Committees under Rule XI, clause 2(m)(1)(B) of the Rules of the House of Representatives, Rule 12(g) of the Oversight Committee’s Rules, and Rule IV(a) of the Judiciary Committee’s Rules.

The Committees are seeking records related to James Biden and entities associated with him. As part of its investigation, the Oversight Committee has reviewed bank records of individuals and entities associated with the Biden family as well as other evidence. This review uncovered a pattern of financial complexity. As detailed in the Impeachment Memorandum and the Oversight Committee’s Bank Memoranda, the Biden family used corporate bank accounts of third-party associates to receive wires from foreign companies and foreign nationals. The Biden business associates would then disperse money to various Biden family members in incremental payments over time.

While much of this money went to Robert Hunter Biden’s professional corporation, Owasco P.C., and his other bank accounts, other Biden family members, including James Biden and his companies, received significant payments as well. For instance, the Oversight Committee has confirmed that Hudson West III—a company organized by Chinese nationals operating Hudson West V (CEFC) and Owasco, P.C. (Hunter Biden’s professional


2 Id.
corporation)—paid tens of thousands of dollars to Lion Hall Group, LLC. Lion Hall Group, LLC is a company associated with James Biden and had a ■■■■ account. Additionally, the Oversight Committee has found significant payments to JBBSR, Inc., another company associated with James Biden, after Robinson Walker, LLC received a $3 million payment from the Chinese company, State Energy HK Limited. The Committees have not identified legitimate services provided by James Biden’s companies to CEFC-affiliated entities that would warrant such payments.

On September 12, 2023, Speaker Kevin McCarthy directed the Committees to open a formal impeachment inquiry into President Joe Biden. Evidence shows that Joe Biden was aware of at least some of his family’s business ventures and sought to influence potential business deals that financially benefited his family. Indeed, a Biden business associate, Devon Archer, testified how the Biden “brand” was used in retaining business, and that Joe Biden met with some of the foreign nationals who paid his family. Accordingly, the Committees seek additional information regarding the use and ultimate destination of these funds given Joe Biden’s involvement with individuals who were paying these companies (that are associated with his family) and ultimately his family members themselves. The subpoenaed bank records will help the Committees determine whether Joe Biden abused his office by selling access and/or by receiving payments or other benefits in exchange for official acts, which is a critical aspect of the Committees’ impeachment inquiry.

The records sought by this subpoena will also assist in efforts to craft legislative solutions aimed at deficiencies that have been identified in the current legal framework regarding ethics laws and disclosure of financial interests related to the immediate family members of Vice Presidents and Presidents—deficiencies that may place American national security and interests at risk. These requested records should provide the Committees with unique and particularized information critical to Congress’s investigation of a systemic failure to protect against potential malign foreign interactions with family members of senior elected officials. Specifically, the Committees are concerned that foreign nationals and foreign companies appear to have sought access and influence by engaging in lucrative business relationships with high-profile political figures’ immediate family members.

The Committees are also concerned about the national security implications of a President’s or Vice President’s immediate family members receiving millions of dollars from foreign nationals or companies without any oversight. Current financial disclosure laws and regulations do not require non-dependent family members to provide any information to the public. Meaningful reforms to government ethics and disclosure laws are therefore being explored that will provide necessary transparency into a President’s or Vice President’s immediate family members’ income, assets, and financial relationships with companies. In particular, the Oversight Committee intends to develop legislation that would strengthen

\[3\] Transcribed interview of Devon Archer, H. Comm. on Oversight & Accountability (July 31, 2023), at 29.
reporting requirements related to certain foreign transactions involving senior elected officials' family members and implement financial disclosure laws that shed light on ownership of opaque corporate entities. Moreover, to prevent financial transactions from being structured in a way to evade disclosure, the Oversight Committee is examining whether certain reporting requirements, including any new reporting requirements for senior elected officials' family members, should extend for a period of time after a President or Vice President leaves office.

In addition, ways to strengthen the Bank Secrecy Act and anti-money laundering laws are being considered by analyzing whether financial institutions have the available tools and support from federal agencies to thwart illegal money laundering and foreign corruption activity. In particular, the Oversight Committee is evaluating whether Suspicious Activity Reports generated by personal and corporate bank accounts associated with a President’s or Vice President’s immediate family members should undergo a more rigorous banking compliance process, receive an expedited review by law enforcement, and be disclosed to Congress, under certain circumstances, given the potential corruption and risks to our national security.

We aim to draft legislation that provides more transparency to the American people, deters foreign interests from attempting to obtain influence over and access to the highest levels of the federal government by entering into business deals with Presidential or Vice-Presidential family members, discourages such family members from profiting from their relative's public service, and ensures the nation is safe from our foreign adversaries.

In short, the records sought by this subpoena are critical to both the impeachment inquiry and to further the Committees' legitimate legislative purposes. As Chairmen of the Committees, we urge you to cooperate speedily and in good faith with these subpoenas. If you have any questions regarding these subpoenas, please coordinate with Oversight Committee staff at (202) 225-5074 and Judiciary Committee staff at (202) 225-6906.

Sincerely,

James Comer
Chairman
Committee on Oversight and Accountability

Jim Jordan
Chairman
Committee on the Judiciary
cc: The Honorable Jamie Raskin, Ranking Member
    Committee on Oversight and Accountability

The Honorable Jerrold L. Nadler, Ranking Member
    Committee on the Judiciary
SUBPOENA

BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE CONGRESS OF THE UNITED STATES OF AMERICA

To ______________________

You are hereby commanded to be and appear before the Committee on Oversight and Accountability of the House of Representatives of the United States at the place, date, and time specified below.

☐ to produce the things identified on the attached schedule touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

| Place of production: 2157 Rayburn House Office Building, Washington, D.C. 20515 |
| Date: 10/12/23 | Time: 5:00 PM (EST) |

☐ to testify at a deposition touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

| Place of testimony: _________________________ |
| Date: _________________________ | Time: _________________________ |

☐ to testify at a hearing touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

| Place of testimony: _________________________ |
| Date: _________________________ | Time: _________________________ |

To any authorized staff member or designated official with the United States Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, DC this 28 day of September, 2023.

Attest: _________________________

Clerk

Chairman or Authorized Member
Schedule to Subpoena

In accordance with the attached Schedule instructions, the custodian of records is required to produce the following documents and communications that are in the Bank's possession, custody, or control, from January 1, 2014 to present, in unredacted form:

1. All financial records, including but not limited to account statements, correspondent bank records, deposits, direct deposits, checks, cashier checks, wire transfers, electronic transfer payments, credit card and debit card records, loan documents and supporting documentation, all records regarding the opening of the accounts, signature cards, copies of identification presented by the account holder or any other signatory, account closing documents, and "know your client" (KYC) and due diligence documents, for the following individuals and entities, as well as all corporate entities affiliated with or linked to the following individuals and entities:

   a. James Biden
   b. Lion Hall Group, LLC

For business accounts, this should also include any corporate identification documents, documents involving beneficial owners, and documents and communications related to the purpose of the business account.

2. Documents sufficient to show all accounts opened and closed by the individuals and entities listed in 1(a)-1(b) above and the corporate entities affiliated with or linked to them.

3. All documents and internal and external communications referring or relating to any person named in 1(a)-1(b) above or any corporate entity affiliated with or linked to any such person, including communications and documents related to KYC and due diligence communications regarding the individuals and entities named above.
September 28, 2023

Dear Mr. [Redacted]:

The Committee on Oversight and Accountability and the Committee on the Judiciary (collectively “the Committees”) are subpoenaing certain financial records in [Redacted] possession, custody, or control. These subpoenas are being issued at the bank’s request and pursuant to our authority as the Chairmen of the Committees under Rule XI, clause 2(m)(1)(B) of the Rules of the House of Representatives, Rule 12(g) of the Oversight Committee’s rules, and Rule IV(a) of the Judiciary Committee’s Rules.

The Committees are seeking records related to Robert Hunter Biden (Hunter Biden) and entities associated with him. As part of its investigation, the Oversight Committee has reviewed bank records of individuals and entities associated with the Biden family as well as other evidence. This review uncovered a pattern of financial complexity. As detailed in the Impeachment Memorandum and the Oversight Committee’s Bank Memoranda, the Biden family used corporate bank accounts of third-party associates to receive wires from foreign companies and foreign nationals. The Biden business associates would then disperse money to various Biden family members in incremental payments over time.

While much of this money went to Hunter Biden’s professional corporation, Owasco P.C., and his other bank accounts, other Biden family members and their companies received significant payments as well. For instance, the Oversight Committee has confirmed that both Rosemont Seneca Bohai, LLC and Robinson Walker, LLC received payments from foreign companies and individuals and then made payments to Owasco, P.C., Hunter Biden’s bank accounts, and other Biden family members. The Oversight Committee has identified payments

---

2 Id.
3 Id.
to Hunter Biden’s [redacted] accounts from Rosemont Seneca Bohai, LLC. The Committees are concerned that Hunter Biden sought to conceal the source of foreign income by having lucrative wires sent to the Rosemont Seneca Bohai, LLC account instead of his own bank accounts at [redacted] and elsewhere. We believe these records will provide insight as to where the foreign money was finally sent.

On September 12, 2023, Speaker Kevin McCarthy directed the Committees to open a formal impeachment inquiry into President Joe Biden. Evidence shows that Joe Biden was aware of at least some of his family’s business ventures and sought to influence potential business deals that financially benefited his family. Indeed, a Biden business associate, Devon Archer, testified how the Biden “brand” was used in retaining business, and that Joe Biden met with some of the foreign nationals who paid his family. Accordingly, the Committees seek additional information regarding the use and ultimate destination of these funds given Joe Biden’s involvement with individuals who were paying these companies (that are associated with his family) and ultimately his family members themselves. The subpoenaed bank records will help the Committees determine whether Joe Biden abused his office by selling access and/or by receiving payments or other benefits in exchange for official acts, which is a critical aspect of the Committees’ impeachment inquiry.

The records sought by this subpoena will also assist in efforts to craft legislative solutions aimed at deficiencies that have been identified in the current legal framework regarding ethics laws and disclosure of financial interests related to the immediate family members of Vice Presidents and Presidents—deficiencies that may place American national security and interests at risk. These requested records should provide the Committees with unique and particularized information critical to Congress’s investigation of a systemic failure to protect against potential malign foreign interactions with family members of senior elected officials. Specifically, the Committees are concerned that foreign nationals and foreign companies appear to have sought access and influence by engaging in lucrative business relationships with high-profile political figures’ immediate family members.

The Committees are also concerned about the national security implications of a President’s or Vice President’s immediate family members receiving millions of dollars from foreign nationals or companies without any oversight. Current financial disclosure laws and regulations do not require non-dependent family members to provide any information to the public. Meaningful reforms to government ethics and disclosure laws are therefore being explored that will provide necessary transparency into a President’s or Vice President’s immediate family members’ income, assets, and financial relationships with companies. In particular, the Oversight Committee intends to develop legislation that would strengthen reporting requirements related to certain foreign transactions involving senior elected officials’ family members and implement financial disclosure laws that shed light on ownership of opaque

---

4 Transcribed interview of Devon Archer, H. Comm. on Oversight & Accountability (July 31, 2023), at 29.
corporate entities. Moreover, to prevent financial transactions from being structured in a way to evade disclosure, the Oversight Committee is examining whether certain reporting requirements, including any new reporting requirements for senior elected officials' family members, should extend for a period of time after a President or Vice President leaves office.

In addition, ways to strengthen the Bank Secrecy Act and anti-money laundering laws are being considered, including by analyzing whether financial institutions have the available tools and support from federal agencies to thwart illegal money laundering and foreign corruption activity. In particular, the Oversight Committee is evaluating whether Suspicious Activity Reports generated by personal and corporate bank accounts associated with a President’s or Vice President’s immediate family members should undergo a more rigorous banking compliance process, receive expedited review by law enforcement, and be disclosed to Congress, under certain circumstances, given the potential corruption and risks to national security.

We aim to draft legislation that provides more transparency to the American people, deters foreign interests from attempting to obtain influence over and access to the highest levels of the federal government by entering into business deals with Presidential or Vice-Presidential family members, discourages such family members from profiting from their relative’s public service, and ensures the nation is safe from our foreign adversaries.

In short, the records sought by this subpoena are critical to both the impeachment inquiry and to further legitimate legislative purposes. As Chairmen of the Committees, we urge you to cooperate speedily and in good faith with these subpoenas. If you have any questions regarding these subpoenas, please coordinate with Oversight Committee staff at (202) 225-5074 and Judiciary Committee staff at (202) 225-6906.

Sincerely,

James Comer
Chairman
Committee on Oversight and Accountability

Jim Jordan
Chairman
Committee on the Judiciary
cc: The Honorable Jamie Raskin, Ranking Member
Committee on Oversight and Accountability

The Honorable Jerrold L. Nadler, Ranking Member
Committee on the Judiciary
SUBPOENA

BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE CONGRESS OF THE UNITED STATES OF AMERICA

To: [Redacted]

You are hereby commanded to be and appear before the Committee on Oversight and Accountability of the House of Representatives of the United States at the place, date, and time specified below.

☑ to produce the things identified on the attached schedule touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of production: 2157 Rayburn House Office Building, Washington, D.C. 20515
Date: 10/12/23 Time: 5:00 PM (EST)

☐ to testify at a deposition touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: ____________________________
Date: ___________________ Time: ________________

☐ to testify at a hearing touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: ____________________________
Date: ___________________ Time: ________________

To any authorized staff member or designated official with the United States Marshals Service to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at the city of Washington, D.C. this 28th day of September, 2023.

Attest: [Signature]

Clerk

Chairman or Authorized Member
Schedule to Subpoena

In accordance with the attached Schedule instructions, the custodian of records of [redacted] is required to produce the following documents and communications that are in the Bank's possession, custody, or control, from January 1, 2014 to present, in unredacted form:

1. All financial records, including but not limited to account statements, correspondent bank records, deposits, direct deposits, checks, cashier checks, wire transfers, electronic transfers, payments, credit card and debit card records, loan documents and supporting documentation, all records regarding the opening of the accounts, signature cards, copies of identification presented by the account holder or any other signatory, account closing documents, and "know your client" (KYC) and due diligence documents, for the following individuals and entities, as well as all corporate entities affiliated with or linked to the following individuals and entities:

   a. Robert Hunter Biden

      For business accounts, this should also include any corporate identification documents, documents involving beneficial owners, and documents and communications related to the purpose of the business account.

2. Documents sufficient to show all accounts opened and closed by the individuals and entities listed in 1(a) above and the corporate entities affiliated with or linked to them.

3. All documents and internal and external communications referring or relating to any person named in 1(a) above or any corporate entity affiliated with or linked to any such person, including communications and documents related to KYC and due diligence communications regarding the individuals and entities named above.