



**U.S. Department of Justice**

*United States Attorney  
Northern District of California*

*1301 Clay Street, Suite 3405  
Oakland, California 94612*

*(510) 637-3680  
FAX: (510) 637-3724*

June 25, 2024

City of Oakland  
c/o City Attorney Barbara Parker  
1 Frank H. Ogawa Plaza, 6th Floor  
Oakland, CA 94612

**Re: Federal Grand Jury Subpoena**

Dear City Attorney Parker:

The attached Federal Grand Jury subpoena is issued in furtherance of a federal criminal investigation being conducted under the supervision of this Office.

This is to certify that there is sufficient reason to believe that notification of this subpoena and your compliance therewith, or disclosure of the information provided thereunder, could seriously impede and thwart this important investigation. Therefore, you are requested to withhold disclosure and notification for an indefinite period of time.

Thank you for your cooperation in this matter. If you have any questions regarding this Grand Jury subpoena, please contact FBI Special Agent Duncan Haunold, Phone: (510)



Sincerely,

ISMAIL J. RAMSEY  
United States Attorney

*Isj Abraham Fine* \_\_\_\_\_  
ABRAHAM FINE  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT**  
for the  
Northern District of California

**SUBPOENA TO TESTIFY BEFORE A GRAND JURY**

To: City of Oakland

**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.

<b>Place:</b> UNITED STATES DISTRICT COURTHOUSE 1301 CLAY STREET, SUITE 340S OAKLAND, CA 94612	<b>Date and Time:</b>  7/11/2024 at 9:00am
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You must also bring with you the following documents, electronically stored information, or objects *(blank if not applicable)*:

SEE ATTACHMENT TO GRAND JURY SUBPOENA

Voluntary compliance with this federal grand jury subpoena will be deemed satisfactory and no appearance will be necessary, if the information requested is sent to the agent listed below on or before the date listed above.

Federal Bureau of Investigation  
 Special Agent Duncan Haunold  
 2101 Webster Street, Suite 400  
 Oakland CA 94612  
 Email: [REDACTED]  
 Phone: [REDACTED]

Date: June 26, 2024



CLERK OF COURT

*Mark B. Busby*  
 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:

Abraham Fine, AUSA *af*  
 U.S. Attorney's Office, 1301 Clay Street, Suite 340S, Oakland, CA 94612  
 IRS-CI Special Agent Christine Stegner, Phone: 510-907-5026

## Attachment A

### SUBPOENA RECIPIENT

City of Oakland  
c/o City Attorney Barbara Parker  
1 Frank H. Ogawa Plaza, 6<sup>th</sup> Floor  
Oakland, CA 94612  
BParker@oaklandcityattorney.org

#### **I. INSTRUCTIONS**

- A. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agent, employee or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody or control of any third party.
- B. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.
- C. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.
- D. If you believe any responsive documents are protected by a privilege, please provide a privilege log that (1) identifies any and all responsive documents to which the privilege is asserted; (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document; and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.
- E. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

- F. For the purposes of this subpoena, the term “documents” means each and every writing, of whatever nature, whether an original, a draft, or a copy, however produced, reproduced, or stored, whether manually, mechanically, electronically, electromagnetically, or otherwise, and each and every tangible thing from which information can be processed or transcribed. Non-identical copies are deemed to be separate documents. The term “documents” should be read expansively and to include all stored forms and mediums of communication including, but not limited to: e-mails, text messages, internal and external company “chat” messages, recorded telephone or cellular phone calls, recorded meetings such as but not limited to those held on platforms similar to Google Meet, Google Hangouts, Skype, Microsoft Teams, WebEx, Zoom, Slack, Telegram, Discord, and Keybase; external messaging or chats, memoranda, electronic calendar entries, meeting minutes, notes, summaries, telephone records, telephone messages and message logs, books, schedules, reports, studies, appraisals, analyses, lists, interview reports, interoffice communications, results of investigations, working papers, computer data, text messages, letters, facsimiles, contracts, agreements, side-agreements, obligations, promissory notes, receipts, appointment books, personal files, work sheets, pamphlets, proposals, photographs, ledgers, statements, invoices, billing information, notebooks, verifications of assets, balance sheets, financial statements and other compilations of financial data, bank statements and associated bank records, checks, records of wire transfers or cash payments, charts, graphs, research materials, and other documents similar to the foregoing. All documents should be produced in native format with all available metadata. The term “documents” also includes any handwritten or other notes.
- G. “The City of Oakland” or “the City” is used hereinafter to refer to, and includes any Department or Body within the City of Oakland, including but not limited to the Office of the Mayor, the Oakland City Council, the Oakland City Administrator, the Oakland City Clerk, the Department of Economic & Workforce Development, the Department of Finance, the Department of Housing & Community Development, the Planning & Building Department, the Oakland Police Department, the Department of Public Works, and any Boards or Commissions.

## II. REQUEST FOR DOCUMENTS

Unless otherwise noted, for the period of **January 1, 2022, to the present**, please provide:

1. Documents and communications related to California Waste Solutions, Inc., or any of its employees or representatives (including, but not limited to David Duong, Andy Duong, Kristina Duong, Victor Duong, or Michael Duong).
2. Documents and communications related to Evolutionary Homes, LLC, or any of its employees or representatives (including but not limited to David Duong, Andy Duong, Mario Juarez, Julie Wedge, Chris Wedge, or Cesley Frost).
3. Documents and communications related to Andre Jones.
4. Documents and communications related to the use or development of the Former Oakland Army Base.
5. Documents and communications related to any actual, contemplated, proposed, or negotiated declaration of a local emergency on homelessness. This request includes, but is not limited to, documents and communications related to any proposal for a Declaration of a Local Emergency on Homelessness that was considered by the Oakland City Council between January 2023 and December 2023.
6. Documents and communications related to any actual, contemplated, proposed, or negotiated contracts between the City of Oakland and any waste management company.
7. Documents and communications related to appointments to any City of Oakland official post, including but not limited to appointments related to the Board of Commissioners for the Port of Oakland, Public Works, Planning & Building Department, the Department of Housing & Community Development, and the City Administrator's Office.
8. Documents and communications relating to the 2022 City of Oakland mayoral election, including but not limited to documents and communications related to political mailers, advertisements, independent expenditures, or campaign contributions.
9. All calendar entries or records of the existence of planned or scheduled meetings for Sheng Thao or Andre Jones from June 1, 2022 to present.
10. Documents and communications relating the City's practices, policies, plans, or procedures concerning the retention, destruction, secrecy or confidentiality of documents, including any of the following instructions or suggestions.

- a. That documents be destroyed, altered, or removed from the City's files or that data be altered on, or deleted from, the City's computer systems;
- b. That information should not be committed to writing or should not be retained in the City's files or stored on the City's computer systems (this includes documents instructing or suggesting that the City's internal communications be conducted, or the City's internal documents be transferred, via encrypted communications applications, including but not limited to WhatsApp, Signal, Discord, or Telegram).

**Please provide the records in an electronic format to [dhaunold@fbi.gov](mailto:dhaunold@fbi.gov)**

Documents not in electronic format should be forwarded directly to the Special Agent listed below on or before the return date of this subpoena if you wish to comply voluntarily rather than appearing before the grand jury. Should you have any questions regarding this matter, please contact **Special Agent Duncan Haunold**.

**Documents should be forwarded directly to:**

Federal Bureau of Investigation  
Attn: Special Agent Duncan Haunold  
2101 Webster St. Suite 400  
Oakland, CA 94612  
Tel: [REDACTED]  
Fax: [REDACTED]

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC  
RECORDS PURSUANT TO FEDERAL RULES OF  
EVIDENCE 902(11) AND 902(13)**

I, \_\_\_\_\_, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by \_\_\_\_\_ and my title is \_\_\_\_\_ . I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of \_\_\_\_\_ . The attached records consist of \_\_\_\_\_ .

I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of \_\_\_\_\_ and they were made by \_\_\_\_\_ as a regular practice; and

b. such records were generated by \_\_\_\_\_'s electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of \_\_\_\_\_ in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by \_\_\_\_\_, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

**PROOF OF SERVICE**

This subpoena for *(name of individual or organization)* Oakland Unified School District  
 was received by me on *(date)* \_\_\_\_\_ .

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: