

**Congress of the United States**  
**Washington, DC 20515**

October 4, 2019

The Honorable William B. Taylor, Jr.  
U.S. Department of State  
2201 C Street, N.W.  
Washington, D.C. 20520

Dear Ambassador Taylor:

Pursuant to the House of Representatives' impeachment inquiry, we write to request your appearance at a deposition on **October 15, 2019, at 9:30 a.m. at The Capitol, HVC-304.**

This deposition will be conducted jointly by the Permanent Select Committee on Intelligence, the Committee on Foreign Affairs, and the Committee on Oversight and Reform. The deposition transcript and documents produced by you shall be part of the impeachment inquiry and shared among the Committees. Your failure or refusal to appear at the deposition or produce the requested documents, including at the direction or behest of the President or the White House, shall constitute evidence of obstruction of the House's impeachment inquiry and may be used as an adverse inference against you and the President.

The Committees are investigating the extent to which President Trump jeopardized national security by pressing Ukraine to interfere with our 2020 election and by withholding security assistance provided by Congress to help Ukraine counter Russian aggression.

We believe you have information and documents relevant to the Committees' investigation. Today, the Committees wrote separately to Deputy Secretary John Sullivan notifying him that the Committees have scheduled your deposition for the date and time set forth above.

Attached for your reference are the House Deposition Rules and H. Res. 6, 116<sup>th</sup> Congress, including Section 103(a) as referenced in the Deposition Rules.

We also request that you produce the documents set forth in the accompanying Document Request by the date of your deposition. An attachment to this letter provides additional instructions for responding to the Committees' request.

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If you have any questions, please contact staff for the Permanent Select Committee on Intelligence at (202) 225-7690.

Sincerely,



Eliot L. Engel  
Chairman  
House Committee on Foreign Affairs



Adam Schiff  
Chairman  
House Permanent Select Committee  
On Intelligence



Elijah E. Cummings  
Chairman  
House Committee on Oversight and Reform

Enclosure

cc: The Honorable Michael McCaul, Ranking Member  
House Committee on Foreign Affairs

The Honorable Devin Nunes, Ranking Member  
House Permanent Select Committee on Intelligence

The Honorable Jim Jordan, Ranking Member  
House Committee on Oversight and Reform

## Document Request

Please produce all documents and communications in your possession, custody, or control referring, relating to, or involving the following subjects. Unless otherwise noted, the time frame for this request is **January 20, 2017 to the present**. The Committees request that these materials be provided to the Committees before or at your deposition.

1. President Trump's April 21, 2019, and July 25, 2019, telephone conversations with Ukrainian President Volodymyr Zelensky, including but not limited to:
  - a. All recordings, transcripts, notes (including electronic and hand-written notes), summaries, and draft versions of the official "Memorandum of Telephone Conversation";
  - b. All preparatory memoranda and materials; and
  - c. The identity of all individuals who listened to, participated in, assisted in preparation for, transcribed, took notes during, or received information about the April 21, 2019, and July 25, 2019, telephone conversations;
2. Communications between or among any of the following referring or relating in any way to the April 21, 2019, or July 25, 2019, telephone conversations:
  - a. Current or former White House officials, employees, and detailees, including within the White House Counsel's Office, the White House Situation Room, and the National Security Council (NSC);
  - b. Current or former employees or officials of the Department of State, including but not limited to Secretary Michael R. Pompeo, Counselor T. Ulrich Brechbuhl, former Special Representative for Ukraine Negotiations Ambassador Kurt Volker, Deputy Assistant Secretary George Kent, U.S. Embassy in Ukraine Deputy Chief of Mission Kristina Kvien, and Ambassador to the European Union Gordon Sondland;
  - c. Current or former employees or officials of the Department of Justice, including but not limited to Attorney General William "Bill" Barr;
  - d. Current or former employees or officials of the Department of Energy, including but not limited to Secretary Rick Perry;
  - e. Current or former employees or officials of the Office of the Director of National Intelligence (ODNI), including but not limited to Acting Director Joseph Maguire and ODNI's Office of General Counsel;
  - f. Current or former employees or officials of the Central Intelligence Agency, including but not limited to General Counsel Courtney Simmons Elwood; and

- g. Current or former employees or officials of the Department of Defense, including but not limited to Secretary of Defense Mark Esper;
- 3. The actual or potential suspension, withholding, delaying, freezing, or releasing of foreign assistance of any kind, including but not limited to security assistance, to Ukraine;
- 4. Any offers extended by President Trump to, or requests from, President Zelensky or other Ukrainian government officials for a meeting between President Trump and President Zelensky, including an Oval Office meeting;
- 5. Any of the following meetings or potential meetings:
  - a. All telephone calls, meetings, visits, or other communication involving President Trump and President Zelensky, including but not limited to requests, suggestions, proposals, or other communications relating to the same;
  - b. A meeting at the White House on or around May 23, 2019, involving President Trump, former Special Representative for Ukraine Negotiations Ambassador Kurt Volker, Energy Secretary Rick Perry, or Ambassador Gordon Sondland;
  - c. President Zelensky's inauguration on May 20, 2019, in Kiev, Ukraine, including but not limited to President Trump's decision not to attend and not to send Vice President Pence to lead the U.S. delegation and to instead send Energy Secretary Rick Perry;
  - d. A meeting between President Zelensky and Ambassador Gordon Sondland, Jared Kushner, Energy Secretary Perry, and other U.S. officials in Brussels, Belgium on or about June 4, 2019;
  - e. A meeting on or about July 10, 2019, at the White House between Ukrainian officials Andriy Yermak and Oleksander Danylyuk and U.S. government officials, including Energy Secretary Perry, former National Security Advisor John Bolton, former Special Representative for Ukraine Negotiations Ambassador Kurt Volker, and Ambassador Gordon Sondland, including but not limited to the proposed or actual participation of President Trump and Vice President Pence in the meeting;
  - f. A potential meeting between President Trump and President Zelensky in Warsaw, Poland in or around September 2019, including but not limited to President Trump's decision to cancel his attendance;
  - g. All meetings and communications between U.S. officials, including but not limited to Vice President Pence, Energy Secretary Perry, and President Zelensky

or other Ukrainian government officials in Warsaw, Poland in or around September 2019;

- h. A telephone call between Secretary of State Pompeo and the Ukrainian Foreign Minister on or about September 17, 2019;
  - i. A telephone call between Vice President Pence and President Zelensky on or about September 18, 2019; and
  - j. All meetings between President Trump and President Zelensky during the United Nations General Assembly in or around September 2019, including but not limited to any discussion of their July 25, 2019, telephone conversation, as well as any preparatory memoranda and materials generated for the meeting; any notes, readouts, summaries of the same; and any follow-up directives and guidance issued to NSC staff, as well as relevant departments and agencies, either formally or informally;
- 6. Efforts by any current or former member of the Trump Administration or Rudolph ("Rudy") W. Giuliani, Igor Fruman, Lev Parnas, Semyon ("Sam") Kislin, Joseph diGenova, Victoria Toensing, Vitaly Pruss, or any of their associates, to induce, compel, petition, press, solicit, request, or suggest that current or former Ukrainian government officials, politicians, or other persons or entities associated with or acting in any capacity as a representative, agent, or proxy for any such individuals, investigate matters related to Burisma Holdings Ltd., Paul Manafort, Hunter Biden, Joseph Biden Jr., the Democratic National Committee, Hillary Clinton, and/or any U.S. persons or entities;
  - 7. All meetings or communications with officials or employees of the U.S. Department of Justice relating to the investigations described in paragraph 6;
  - 8. Former U.S. Ambassador to Ukraine Marie "Masha" Yovanovitch, including but not limited to the decision to end her tour or recall her from the U.S. Embassy in Kiev;
  - 9. The acquisition by Ukraine of Javelin missiles from the United States and the decision by Ukraine to investigations of Paul Manafort and cease cooperation with Special Counsel Robert Mueller's investigation in or about March/April 2018;
  - 10. The investigation announced by the Permanent Select Committee on Intelligence, Foreign Affairs Committee, and Oversight and Reform Committee of the U.S. House of Representatives on September 9, 2019;
  - 11. The Intelligence Community whistleblower complaint that was made public on September 26, 2019;

12. The resignation of former Special Representative for Ukraine Kurt Volker on or about September 27, 2019; and
13. Efforts to conceal, destroy, or otherwise dispose of any documents, records, or communications referring or relating to any of the foregoing matters.