

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

IN RE GRAND JURY SUBPOENAS TO  
THE OFFICE OF THE NEW YORK STATE  
ATTORNEY GENERAL

Case No.: 1:25-mc-19 (AJB/DJS)

**DECLARATION OF ROXANNE E. WILD IN SUPPORT OF  
THE OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL'S  
MOTION TO QUASH GRAND JURY SUBPOENAS**

**DECLARATION OF ROXANNE E. WILD**

I, ROXANNE E. WILD, hereby declare:

1. I am the Managing Attorney for Office of the New York State Attorney General (“OAG”). As part of my responsibilities as Managing Attorney, I oversee the clerical staff at OAG’s Managing Attorney’s Office at 28 Liberty, New York, New York (“New York Executive Office”), and at The Capitol, the Robert Abrams Building, Albany, New York (“Capitol Office”), both of which are authorized to accept the service of legal papers served on OAG and which create and maintain the records of such service in a computerized database. In the regular course of business, upon the receipt of a document received by OAG, a clerk will immediately create an electronic record documenting its service in the computerized database.

2. I base this declaration on my personal knowledge and review of records maintained by OAG, and, if called as a witness, I could and would testify competently to the matters set forth herein.

3. Attached as **Exhibit 1** is a true and correct copy of a Grand Jury Subpoena dated August 5, 2025, issued by the United States District Court for the Northern District of New York, apparently at the request of Acting United States Attorney John A. Sarcone III, directed to the Office of the New York State Attorney General (“Trump Case Subpoena”). The Trump Case Subpoena calls for the production of “[a]ny and all documents and records relating to” and “any and all documents and records reflecting communications about” *People of the State of New York v. Donald J. Trump, et al.*, Index No. 452564/2022 “for the time period January 1, 2022 to the present, in the possession, custody, or control of the Office of the New York State Attorney General.” This subpoena commands the production of documents by August 21,

2025. The Trump Case Subpoena is attached to a cover letter, dated August 5, 2025, addressed to the Custodian Records of the Office of the New York State Attorney General, and signed by Mr. Sarcone. The cover letter states: “This subpoena relates to an ongoing criminal investigation.”

4. The cover letter and subpoena attached as Exhibit 1 were received by the Office of the New York State Attorney General on August 5, 2025, at 4:00 p.m., as reflected by the stamp placed by my office at the top of the cover letter.

5. Attached as **Exhibit 2** is a true and correct copy of a Grand Jury Subpoena dated August 5, 2025, issued by the United States District Court for the Northern District of New York, apparently at the request of Acting U.S. Attorney John A. Sarcone III, directed to the Office of the New York State Attorney General (“NRA Case Subpoena”). The NRA Case Subpoena calls for the production of “[a]ny and all documents and records relating to” and “any and all documents and records reflecting communications about” *People of the State of New York v. The National Rifle Association of America, et al.*, Index No. 451625/2020 “for the time period January 1, 2020, to the present, in the possession, custody, or control of the Office of the New York State Attorney General.” The subpoena commands the production of documents by August 21, 2025. The NRA Case Subpoena is attached to a cover letter, dated August 5, 2025, addressed to the Custodian Records of the Office of the New York State Attorney General, and signed by Mr. Sarcone. The cover letter states: “This subpoena relates to an ongoing criminal investigation.”

6. The cover letter and subpoena attached as Exhibit 2 were received by the Office of the New York State Attorney General on August 5, 2025, at 3:59 p.m., as reflected by the stamp placed by my office at the top of the cover letter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 18<sup>th</sup> day of August, 2025, at New York, New York.

A handwritten signature in black ink, appearing to read "Roxanne E. Wild". The signature is written in a cursive style with a horizontal line underneath it.

ROXANNE E. WILD

# EXHIBIT 1



United States Department of Justice

United States Attorney  
Northern District of New York

445 Broadway, Room 218  
James T. Foley U.S. Courthouse  
Albany, New York 12207-2924

Tel.: (518) 431-0247  
Fax: (518) 431-0249

August 5, 2025

Office of the New York State Attorney General  
The Capitol  
Albany, New York 12224-0341

Re: Grand Jury Subpoena *Duces Tecum*

Dear Custodian of Records:

Enclosed please find a federal grand jury subpoena *duces tecum* requiring the Office of the New York State Attorney General to produce designated documents and records. The subpoena requires your Office to produce the demanded documents and records to the grand jury. If you prefer to produce the materials by mail or email rather than appearing personally, you may do so provided that the materials are produced by 10:00 a.m. on August 21, 2025. The documents and records may be sent to:

John A. Sarcone III  
Acting United States Attorney  
United States Attorney's Office  
James T. Foley U.S. Courthouse  
445 Broadway, Room #218  
Albany, NY 12207  
John.Sarcone@usdoj.gov

This subpoena relates to an ongoing criminal investigation. As a result, we request that you not disclose the existence of this subpoena to any person, other than those assisting in compliance with the subpoena, unless and until we notify you that the investigation has been completed or a court orders disclosure. Premature disclosure could impede the investigation and interfere with the enforcement of the law. If you nonetheless plan to make such a disclosure, we request that you give us notice before doing so.

Thank you for your assistance. If you have any questions, you may contact me at (518) 431-0247 or John.Sarcone@usdoj.gov, or Federal Bureau of Investigation Special Agent Christopher Murphy at (518) 431-7200.

Very truly yours,

John A. Sarcone III  
Acting United States Attorney  
Northern District of New York

Encl.

2025 AUG -5 PM 4:00  
STATE OF NEW YORK  
ATTORNEY GENERAL  
MANAGING ATTORNEY'S OFFICE  
RECEIVED 8/19

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

# UNITED STATES DISTRICT COURT

for the

Northern District of New York

## SUBPOENA TO TESTIFY BEFORE A GRAND JURY

STATE OF NEW YORK  
ATTORNEY GENERAL  
MARGARET S. SUTHERLAND  
RECEIVED  
2025 AUG -5 PM 4:00

To: Office of the New York State Attorney General  
The Capitol  
Albany NY 12224-0341

**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.

SUBPOENA FOR: DOCUMENTS

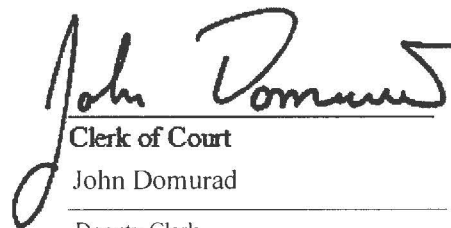
Place: Albany Grand Jury  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, NY 12207-2924

Date and Time:  
08/21/2025 10:00 am

You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

Please see attached

Date: 08/05/2025  
\_\_\_\_\_

  
Clerk of Court  
John Domurad  
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:

John A. Sarcone III  
Acting United States Attorney  
445 Broadway, Room 218  
Albany, NY 12207-2924  
518-431-0247  
John.Sarcone@usdoj.gov

**ATTACHMENT TO SUBPOENA ISSUED TO:**

**Office of the New York State Attorney General  
The Capitol  
Albany, New York 12224-0341**

**Instructions:**

1. This Subpoena calls for the production of documents and records (as defined below), for the time period January 1, 2022 to the present, in the possession, custody, or control of the Office of the New York State Attorney General.
2. Where possible, please produce the records requested herein in electronic form (native format where necessary to view the material in its full scope) in a manner that is OCR-searchable, and with all available electronic metadata.
3. This subpoena does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be specifically identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

**Definitions:**

1. “Documents” and “records” refers to any and all writings, emails, messages, communications, images, videos, and other data and data compilations, in whatever form kept, to include both paper and electronic form.
2. The “Subject Case” refers to *People of the State of New York v. Donald J. Trump, et al.*, Index No. 452564/2022.

**Materials To Be Produced:**

1. Any and all documents and records relating to the Subject Case.
2. Any and all documents and records reflecting communications about the Subject Case between any agent and/or employee of the Office of the New York State Attorney General and any other third-party individual and/or entity, including but not limited to emails, letters, and/or text messages.

# EXHIBIT 2



United States Department of Justice

United States Attorney  
Northern District of New York

445 Broadway, Room 218  
James T. Foley U.S. Courthouse  
Albany, New York 12207-2924

Tel.: (518) 431-0247  
Fax: (518) 431-0249

August 5, 2025

Office of the New York State Attorney General  
The Capitol  
Albany, New York 12224-0341

STATE OF NEW YORK  
ATTORNEY GENERAL  
MANAGEMENT SYSTEMS OFFICE  
RECEIVED  
2025 AUG -5 PM 3:59

Re: Grand Jury Subpoena *Duces Tecum*

Dear Custodian of Records:

Enclosed please find a federal grand jury subpoena *duces tecum* requiring the Office of the New York State Attorney General to produce designated documents and records. The subpoena requires your Office to produce the demanded documents and records to the grand jury. If you prefer to produce the materials by mail or email rather than appearing personally, you may do so provided that the materials are produced by 10:00 a.m. on August 21, 2025. The documents and records may be sent to:

John A. Sarcone III  
Acting United States Attorney  
United States Attorney's Office  
James T. Foley U.S. Courthouse  
445 Broadway, Room #218  
Albany, NY 12207  
John.Sarcone@usdoj.gov

This subpoena relates to an ongoing criminal investigation. As a result, we request that you not disclose the existence of this subpoena to any person, other than those assisting in compliance with the subpoena, unless and until we notify you that the investigation has been completed or a court orders disclosure. Premature disclosure could impede the investigation and interfere with the enforcement of the law. If you nonetheless plan to make such a disclosure, we request that you give us notice before doing so.

Thank you for your assistance. If you have any questions, you may contact me at (518) 431-0247 or John.Sarcone@usdoj.gov, or Federal Bureau of Investigation Special Agent Christopher Murphy at (518) 431-7200.

Very truly yours,

John A. Sarcone III  
Acting United States Attorney  
Northern District of New York

Encl.

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

# UNITED STATES DISTRICT COURT

for the

Northern District of New York

## SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Office of the New York State Attorney General  
The Capitol  
Albany NY 12224-0341

STATE OF NEW YORK  
ATTORNEY GENERAL  
MANAGING DIRECTOR'S OFFICE  
2025 AUG -5 PM 3:59

**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.

### SUBPOENA FOR: DOCUMENTS

Place: Albany Grand Jury  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, NY 12207-2924

Date and Time:  
08/21/2025 10:00 am

You must also bring with you the following documents, electronically stored information, or objects *(blank if not applicable)*:

Please see attached

Date: 08/05/2025

*John Domurad*  
Clerk of Court  
John Domurad  
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:

John A. Sarcone III  
Acting United States Attorney  
445 Broadway, Room 218  
Albany, NY 12207-2924  
518-431-0247  
John.Sarcone@usdoj.gov

**ATTACHMENT TO SUBPOENA ISSUED TO:**

**Office of the New York State Attorney General  
The Capitol  
Albany, New York 12224-0341**

**Instructions:**

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3. This subpoena does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be specifically identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

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