

## INTERROGATORIES

Submitted to David Daleiden, Chief Executive Officer  
Center for Medical Progress

Submitted by Rep. Elijah E. Cummings, Ranking Member  
Committee on Oversight and Government Reform  
U.S. House of Representatives

Return Date: October 20, 2015

1. Did you or your associates at the Center for Medical Progress or BioMax Procurement Services LLC ("associates") ever assume names or identities that were not your own? If so, provide descriptions of each such identity, all documents reflecting each such identity, and a description of how and by whom these documents were created.
2. Did you or your associates ever gain access or entry to the premises of Planned Parenthood headquarters or any affiliate office or health center based on the provision of any false or inaccurate information? If so, describe each incident, including the information provided, who provided such information, the recipient of such information, and the location of the premises accessed. Produce copies of any documents containing this information.
3. Did you or your associates ever gain access or entry to the premises of any other organization based on any false or inaccurate information you provided? If so, describe each incident, including the information provided, who provided such information, the recipient of such information, and the location of the premises accessed. Produce copies of any documents containing this information.
4. Did you or your associates ever use an identity that belonged to another living person? If so, describe each incident and produce copies of any documents containing this information.
5. Did one of your associates attempt to pass herself off as an individual known as Brianna Allen? Did you attend high school with an individual with this same name? If so, provide copies of all documents relating to this incident.
6. Did you or your associates ever provide false or inaccurate information to any federal or state government agency? If so, describe each incident, including the information provided, who provided such information, and the identity of the agency to which it was provided. Produce copies of any documents containing this information.
7. Did you or your associates ever provide false or inaccurate information to any credit card company? If so, describe each incident, including the information provided, who provided such information, and the identity of the company to which it was provided. Produce copies of any documents containing this information.

8. Did you or your associates ever obtain a credit card using false or inaccurate information? If so, provide the identity of the credit card company and account information for such card, and produce copies of any documents containing such information and all statements reflecting activity on the account.
9. Did you or your associates ever create, cause to be created, or obtain a false or inaccurate driver's license? If so, describe how you obtained such license and produce all original copies of each such license.
10. Did you or your associates ever provide false or inaccurate information to the California Department of Motor Vehicles? If so, describe each incident, and produce copies of all documents containing such information and all correspondence with the Department.
11. Did you or your associates ever forge a state or federal seal or utilize such a seal without express permission from federal or state authorities? If so, describe each incident, and produce all documents reflecting such unauthorized use.
12. Did you ever attempt to pass yourself off as an individual named Robert Daoud Sarkis? If so, please describe each incident. Produce all documents related to these incidents.
13. Did you create, cause to be created, or obtain an authentic or counterfeit California driver's license with your photo and the name Robert Daoud Sarkis? If so, describe how you obtained such license, and produce all documents relating to such license.
14. Did you or your associates ever create, cause to be created, or obtain other authentic or counterfeit documents, including but not limited to social security cards, passports, utility or other bills to document proof of address, that reflected information or identities that were not your own? If so, describe each incident, and produce all documents containing this information.
15. Did you or your associates ever provide false, inaccurate, or incomplete information to the Office of the Secretary of State of California? If so, describe each incident, and provide copies of all documents containing this information.
16. Did you or your associates ever provide false, inaccurate, or incomplete information to the Office of the Attorney General of California? If so describe, each incident, and provide copies of all documents containing this information.
17. Did you or your associates ever provide false, inaccurate, or incomplete information to the Registry of Charitable Trusts of California? If so, describe each incident, and provide copies of all documents containing this information.
18. Did you or your associates ever provide false, inaccurate, or incomplete information to the Internal Revenue Service? If so, describe each incident, and provide copies of all documents containing this information.
19. Did you or your associates originally form the Center for Medical Progress with the intent of exposing Planned Parenthood for actions you believed were unethical or illegal?

If so, did you withhold this fact from the Internal Revenue Service during your application process for tax exempt status? If so, describe your reasons for withholding this information.

20. Did you or your associates ever accept financial contributions from anyone who was not informed that you originally formed the Center for Medical Progress with the intent of exposing Planned Parenthood for actions you believed were unethical or illegal? If so, describe the sources and amounts of such contributions.
  
21. Did you or your associates ever accept financial contributions over the telephone or Internet from any individuals who were not informed that you originally formed the Center for Medical Progress with the intent of exposing Planned Parenthood for actions you believed were unethical or illegal? If so, describe the sources and amounts of such contributions.