

# **EXHIBIT C**

**UNITED STATES DEPARTMENT OF LABOR  
OFFICE OF ADMINISTRATIVE LAW JUDGES**

**COLLEEN A. GRAHAM,**

**Graham,**

**v.**

**CREDIT SUISSE SECURITIES (USA) LLC,  
CREDIT SUISSE FIRST BOSTON NEXT  
FUND INC., PALANTIR TECHNOLOGIES  
INC., and SIGNAC LLC**

**Respondents.**

**Case No. 2019-SOX-00040**

**COMPLAINANT COLLEEN GRAHAM'S  
FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS**

**PLEASE TAKE NOTICE** that pursuant to the Electronic Code of Federal Regulations, 29 CFR §18.61, Complainant Colleen Graham (“Graham”), by and through her attorneys Kraus & Zuchlewski LLP, hereby demand that Respondents Credit Suisse Securities (USA) LLC, Credit Suisse First Boston Next Fund Inc., Palantir Technologies Inc. and Signac LLC (collectively, “Respondents”), provide and permit Graham to inspect and copy all documents described below at the offices of Kraus & Zuchlewski, 60 East 42<sup>nd</sup> Street, Suite 2534, New York, New York 10165, within thirty days of service of these requests.

**INSTRUCTIONS**

A. Pursuant to the Electronic Code of Federal Regulations, 29 CFR §18.53, these document requests are deemed to be continuing beyond the date that Respondents serve their responses upon counsel for Graham. If Respondents or their representatives receive or acquire any information and/or documents responsive to these requests after serving responses to these requests, such information and/or documents should be added to the responses to these requests and served upon counsel for Graham.

B. Each document request should be written out in full before the response to each such document request.

C. Each document request should be answered separately. When a document request has several subparts, each subpart should also be answered separately.

D. If a complete answer cannot be given to any document request, Respondents should answer as much of the request as possible and state why they are unable to give a complete answer to that request.

E. Documents should be produced as they are maintained in the usual course of business and should be organized and labeled to correspond with each itemized document request. Documents responsive to these requests include all documents within the possession, custody, or control of Respondents or their representatives. If any documents responsive to these requests are not within the possession, custody or control of the Respondents or their representatives and counsel for Graham will need a release to acquire such documents, Respondents should provide an appropriate release.

F. With respect to any document which is responsive to a document request but not within the possession, custody or control of the Respondents or their representatives, Respondents should submit a written statement that (a) describes the type of document (e.g., letter, memo, etc.), (b) identifies the author, (c) specifies the date written or originated, (d) identifies each person to whom the original or a copy was addressed and/or delivered, and (e) identifies each and every person who has ever had possession of the document.

G. With respect to any document which is responsive to a document request but for which a privilege is claimed, Respondents should identify the document, state the privilege claimed, and state the factual and legal basis for the asserted privilege. Pursuant to the Electronic

Code of Federal Regulations, 29 CFR §18.51, such documents should be identified by submitting a written statement which (a) describes the type of document (e.g., letter, memo, etc.), (b) identifies the author, (c) specifies the date written or originated, (d) identifies each person to whom the original or a copy was addressed and/or delivered, and (e) identifies each and every person with present possession of the document.

H. If any document which is responsive to a document request is produced in redacted form, those portions of the document that are redacted should be identified and Respondents' response should, with respect to each such redaction, identify the basis for each redaction.

I. With respect to any document which is responsive to a document request that was formerly in the possession, custody or control of Respondents and has been lost or destroyed, in lieu of each such document, Respondents should submit a written statement which (a) describes in detail the nature of the documents and its contents, (b) identifies the author, (c) specifies the date written or originated, (d) identifies each person to whom the original or a copy was addressed and/or delivered, (e) identifies every other person who has ever had possession of the original or a copy of the documents and (f) specifies, if possible, the date on which the document was lost or destroyed, and if destroyed, the conditions of and reasons for such destruction, and the person(s) requesting or performing such destruction.

J. The time period for all requests, unless otherwise specified, is December 31, 2016 to the present and continuing through to the hearing in this matter. Respondents have an continuing duty to supplement their responses to this request through the conclusion of the hearing in this matter.

## DEFINITIONS

A. The term "communication" is defined as the transmittal of information, whether written or oral, in the form of facts, ideas, inquiries or otherwise.

B. The term "document" includes all written, typed printed, recorded or graphic statements, communications, including electronically stored information, or other matters, however produced or reproduced, including, but not limited to, all letters, notes, memoranda, e-mails, faxes, telegrams, telexes, cables, telephone records, records, bills, invoices, ledgers, journals, bulletins, directives, instructions, reports, memoranda of conversations, diaries, affidavits, briefs, pleadings, decrees, transcriptions, recordings, electronic or computer records, photographs, diagrams, charts, drawings, graphs and other writings, including all originals, copies, drafts and non-identical copies in the possession, custody or control of plaintiff or his representatives.

C. A document is within the "possession, custody or control" of Respondents or their representatives, if Respondents or their representatives have the right to secure the document or a copy thereof from another person or entity having actual physical possession thereof.

D. The term "person" is defined as any natural person or any business, corporation, firm, partnership, proprietorship, joint venture, board, authority, commission, legal or government entity or other association.

E. The term "concerning" is defined as relating to, referring to, pertaining to, alluding to, describing, detailing, embodying, evidenced, reflecting, comprising or constituting, whether directly or indirectly, the subject matter identified in a specific document request.

F. The terms "all" and "each" should be construed as all and each.

G. The terms “and” and “or” should be construed either disjunctively or consecutively, as necessary to bring within the scope of each discovery request all responses or document might otherwise be construed to be outside of its scope.

H. The use of the singular form of a word should be construed to include the plural form and vice versa.

I. The use of the masculine form of a word should be construed to include the feminine and neuter forms and vice versa.

J. The use of the past tense form of a word should be construed to include the present tense form and vice versa.

#### **DOCUMENT REQUESTS**

1. Signac’s financial statements in for 2016, 2017, 2018, 2019, and all related work papers.
2. The “dashboard” for the Trader Holistic Surveillance software referred to on Ex. A (“THS”) on the day it was “rolled out” and on the first day of every three-month period thereafter.
3. The video presentation of THS showcased at the December 12, 2018 CS AG Investor Day (see Ex. B).
4. Graham’s personnel file and all performance evaluations while at Signac and Credit Suisse.
5. All calendar entries for meetings or calls concerning Signac from March 1 2017 – July 2019 that included Lara Warner or James Barkley.
6. All communications concerning Graham’s attendance at an Operational Risk Conference in June 2017.
7. All project plans, presentations and reporting regarding the development of THS

on or after July 1, 2017.

8. The investigative file or files concerning Graham's allegations of misconduct.

9. All email communications in the period beginning March 1, 2017 and continuing through the hearing in this matter, concerning Signac or Graham that were sent by or to any of the following: Tidjane Thiam, Alex Karp, Lara Warner, James Barkley, Matt Long.

10. All documentations and communications in the period beginning March 1, 2017 and continuing through the hearing in this matter, concerning the following matters:

- a. the recognition of revenue by Signac;
- b. meetings with the Federal Reserve Bank, the Swiss Financial Market Supervisory Authority, and or the United States Securities and Exchange Commission, regarding THS;
- c. the decision to wind-down Signac;
- d. determining whether either CS AG might utilize any Signac's products;
- e. the valuation of Signac;
- f. maintenance or other services rendered by Palantir in connection with THS;
- g. the development and roll out of the THS software identified in the chart attached as Ex A;
- h. approvals for and or diligence regarding December 12 Investor Day statements in Exs A and B related to THS, including but not limited to its having been "rolled out" in 2017;
- i. Graham's 2016 Performance Bonus; and
- j. Employment of Graham on or after April 2017.

Dated: New York, New York  
August 2, 2019



Robert D. Kraus, Esq.  
Desiree J. Gustafson, Esq.  
*Attorneys for Graham*  
60 East 42<sup>nd</sup> Street, Suite 2534  
New York, New York 10165  
(212) 869-4646 (Telephone)  
(212) 869-4648 (Facsimile)

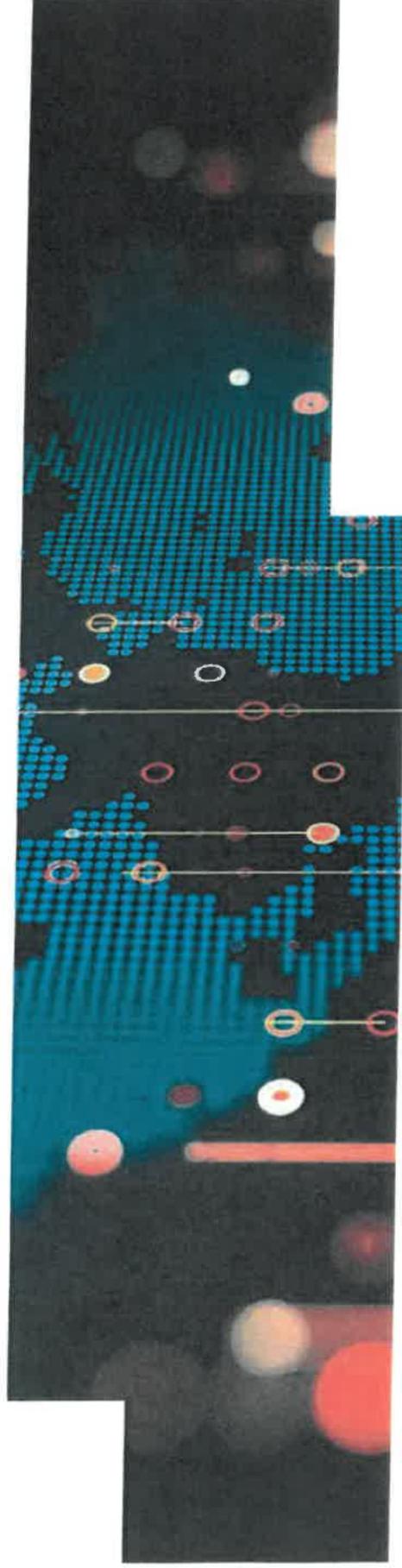
To: Joseph Serino, Jr., Esq.  
Latham & Watkins LLP  
885 Third Avenue  
New York, NY 10022-4834

Jay Lefkowitz, Esq.  
Kirkland & Ellis, LLP  
601 Lexington Avenue  
New York, New York 10022

Elizabeth L. Lewis, Esq.  
Cooley LLP  
11951 Freedom Drive  
Reston, VA 20190

# EXHIBIT A

# Credit Suisse Investor Day 2018

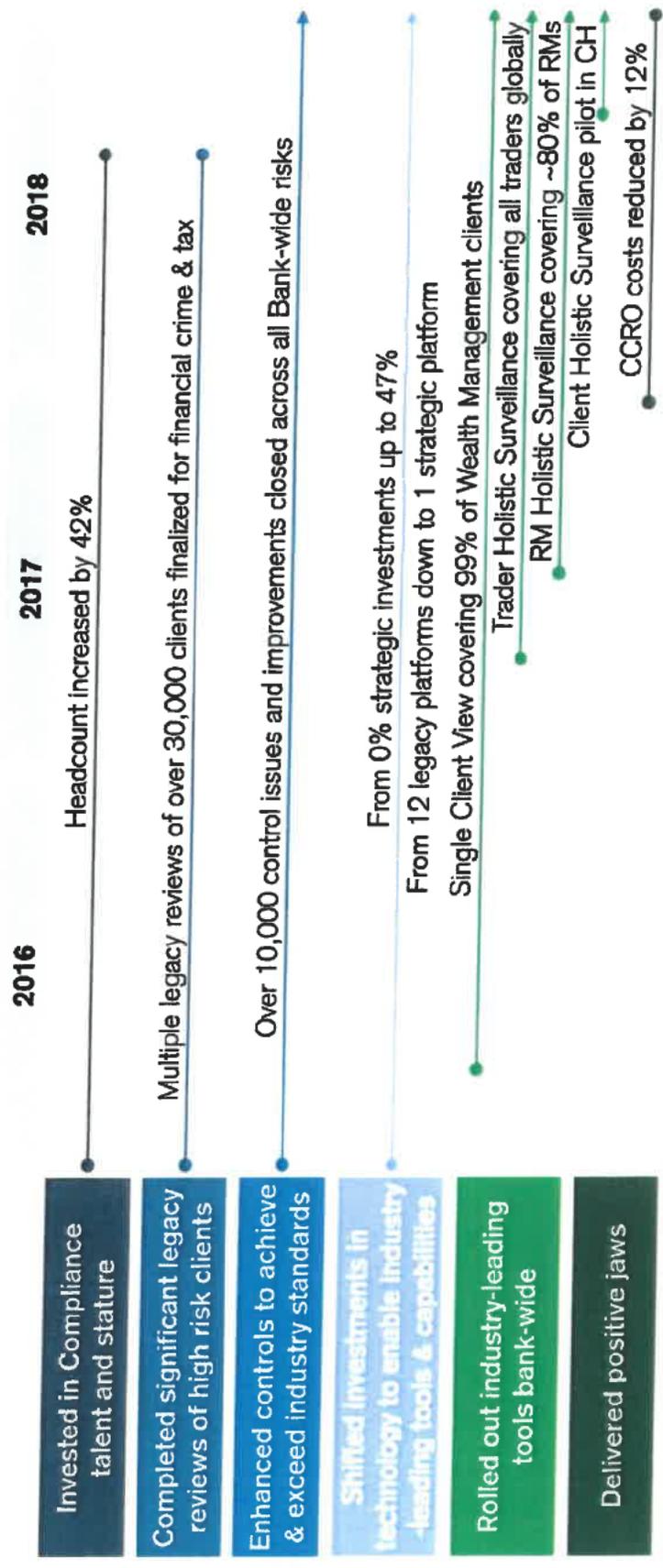


Tidjane Thiam, Chief Executive Officer

December 12, 2018

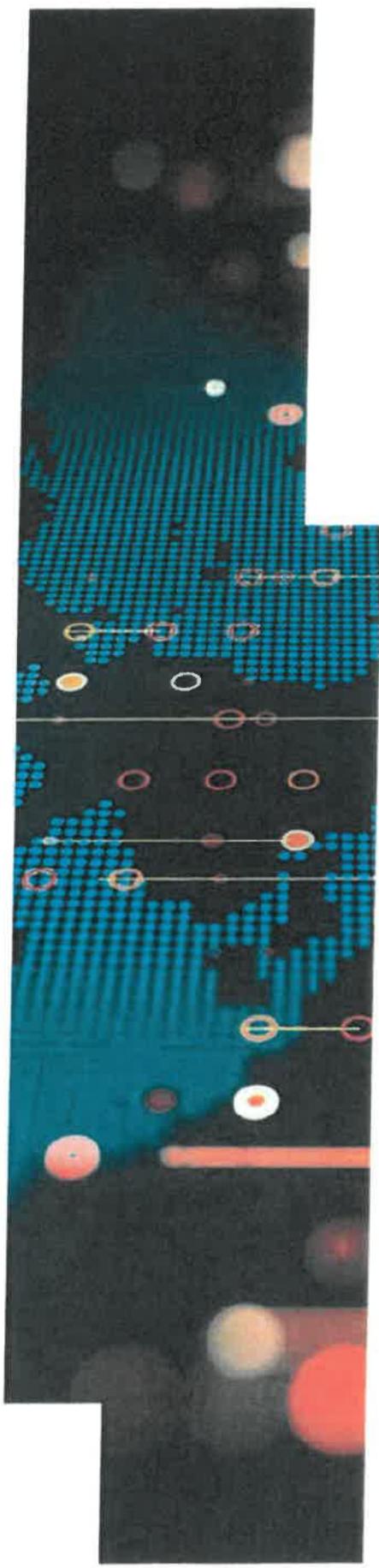


# We have invested significantly to upgrade our Compliance and Control frameworks



# EXHIBIT B

# Utilizing technology Modern Compliance risk management capabilities



Lara Warner, Chief Compliance & Regulatory Officer  
Homa Siddiqui, Chief Compliance & Regulatory Officer COO

December 12, 2018



# CCRO risk management capabilities in action

## Video

