

UNITED STATES SECURITIES AND EXCHANGE
COMMISSION

DIVISION OF ENFORCEMENT
WASHINGTON, D.C. 20549

In the Matter of: OPENAI GROUP PBC & ASSOCIATED CAPITAL CONDUITS	SUBPOENA RIDER Case No: NY-2026-X TCR Ref: 17684-273-411-436
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I. EXECUTIVE STRATEGIC DIRECTIVE

This document request is issued in connection with an investigation into OpenAI Group PBC, OpenAI Foundation, io Products, and associated executive fiduciaries (specifically Chief Hardware Officer Tang Tan and engineer Chang Liu). The objective is to secure unredacted primary sources of evidence relating to (a) the material omission of massive intellectual property liabilities during the May 2025 acquisition of io Products (~\$6.5B) and the subsequent October 2025 Public Benefit Corporation (PBC) restructuring, and (b) systemic trade secret misappropriation utilized to artificially inflate company valuations during the \$122 billion Series G expansion.

II. TARGETED CUSTODY DEMANDS (ENTITIES & DEVICES)

Pursuant to the Commission's authority under Section 19(c) of the Securities Act of 1933 and Section 21(b) of the Securities Exchange Act of 1934, the Recipient is required to produce all documents, communications, metadata, and physical devices in their custody or control according to the following designations:

Custodian Class	Identified Targets	Required Custody Demands / Search Scope
Corporate Entities	OpenAI Group PBC; OpenAI Foundation; io Products (Jony Ive).	All board minutes, transaction ledgers, term sheets, and IP transfer agreements relating to the May 2025 io Products acquisition (\$6.4B-\$6.5B) and the October 2025 PBC conversion.
Executive fiduciaries	Sam Altman (CEO); Tang Tan (CHO); Chang Liu (MTS).	All corporate and personal communication logs (Slack, iMessage, Signal, LINE, WhatsApp) from December 2023 to present; all unredacted emails regarding startup equity-for-tokens deals.
Hardware Candidates	Yu-Ting 'Alyssa' Peng; Plus 11 unnamed ex-Apple hires.	All pre-onboarding interview records, 'show and tell' technical demonstration notes, and records of physical hardware samples brought into OpenAI interview rooms.
Digital Forensics	Corporate Servers & Retained Devices.	Forensic imaging of all hardware design servers, cloud repositories, and the unreturned Apple work laptop retained by Chang Liu following his January 2026 resignation.

III. MANDATORY KEYWORD SEARCH PROTOCOL

Recipient must execute comprehensive electronic searches across all archived emails, messaging databases, and cloud-hosted storage networks. These queries must cover the date range of December 1, 2023, through the present, utilizing the following exact Boolean and wild-card strings:

Subpoena Rider Target ID	Required Keyword / Boolean Search Strings
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Rider Target 1: Ive-io Acquisitions	"Ive" OR "io Products" OR "6.4 Billion" OR "6.5 Billion" OR "Ive AI device" OR "Ive-Altman" OR "Jony" OR "hardware startup" OR "doughnut speaker" OR "screenless speaker"
Rider Target 2: Recruiting & Espionage	"Tang Tan" OR "Tang Yew Tan" OR "Tang Yu Tan" OR "show and tell" OR "parts from Apple" OR "actual hardware" OR "prototype demo" OR "Tan-Ive" OR "Cyrus Irani" OR "Erik de Jong" OR "Matt Theobald" OR "Paul Meade"
Rider Target 3: Forensic & Exfiltration	"Chang Liu" OR "Alyssa Peng" OR "Yu-Ting Peng" OR "LINE" OR "LINE app" OR "residual access" OR "unreturned laptop" OR "authentication bug" OR "authorization vulnerability" OR "fun side projects" OR "highly irregular" OR "network storage"
Rider Target 4: Capital & Arbitrage	"credits-for-equity" OR "token-for-equity" OR "2M tokens" OR "YC batch" OR "Spring 2026" OR "profit cap removal" OR "AGI contingent" OR "public benefit corporation conversion" OR "asset revaluation" OR "FTC circular" OR "SEC self-dealing"

IV. GEOPOLITICAL & WHISTLEBLOWER PROTECTION SECURITY STATEMENT

A. Retaliation & Administrative Malfeasance (Oregon State Treasury / Washington County Sheriff):

This investigation incorporates supplemental findings under SEC Whistleblower No. 17684-273-411-436. Regulatory filings document active, hostile retaliation and whistleblower protection violations executed by the Oregon State Treasury Auditor Division, who engaged in the backdating of official filings to obscure real-time administrative actions. This malfeasance was accompanied by systematic online stalking, which necessitated a criminal report with the Washington County Sheriff's Office (Washington County, Oregon) to secure the safety of the whistleblower and prevent the destruction of primary digital evidence.

B. Geopolitical Asset Siphoning Risk:

Enforcement attorneys must examine potential foreign asset siphoning risks. Specifically, whether OpenAI Group PBC's capital relationships with Middle Eastern and Asian conduits represent a backdoor transition of critical American intellectual property (specifically unreleased CE semiconductor finishes, battery designs, and displays) into foreign jurisdictions. Subpoenas should target any communications where corporate immunities, government backdoors, or regulatory compliance waivers were discussed in connection with foreign capital ingress.