



STATE OF DIXIE
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LEGAL AFFAIRS

R.I.C.O. CRIMES
INVESTIGATIVE SUBPOENA DUCES TECUM

IN THE INVESTIGATION OF:

Cypress Zairn (/u/Zurikurta)
West 125th Street,
New York, AC

TO: CIVIC PEOPLE'S PARTY

ATTENTION: RECORDS CUSTODIAN FOR CIVIC PEOPLE'S PARTY
(any lawful service address)

This investigative Subpoena Duces Tecum is issued pursuant to Dixie's RICO Act, the Dixie Money Laundering Act, and Dixie Statutes 893.135 & 893.13 in the course and authority of an official investigation. The general purpose and scope of this investigation extends to possible drug trafficking activity, possible money laundering activity, and conspiracy to acquire property through a racketeering activity. Your attention is directed to Sections 895.06, 896.101, 893.135, and 893.13 of the Dixie Statutes.

YOU ARE HEREBY COMMANDED to produce all documentary material and other tangible evidence as described herein, that is in your possession, custody or control, or in the possession custody or control of your agents or employees, and to make it available for inspection and copying or reproduction before Attorney General, Brandon Bruno (/u/ItsNotBrandon) and/or their designated representative on Monday November 16th, 2020 at 1 :00 pm at the following location:

**DEPARTMENT OF LEGAL AFFAIRS
OFFICE OF THE ATTORNEY GENERAL**

PL-01 The Capitol
Tallahassee, Dixie

Alternatively, deliver copies of the same on Wednesday November 14th, 2020 by Federal Express or other overnight courier by, with your cover letter itemizing all enclosures.

**ANY PERSON OR ARTIFICIAL ENTITY FAILING TO RESPOND WILL
BE SUBJECT TO LEGAL ACTION.**

ALL DOCUMENTS TO BE DELIVERED IN ELECTRONIC FORM.

DEFINITIONS AND INSTRUCTIONS

- A. "You," "Your" or "CPP" as used herein means the Civic People's Party and any of the respondents, their agents and employees or any "affiliate" of the aforementioned entities, as that term is herein defined. Your agents include but are not limited to your officers, directors, attorneys, accountants, CPA's, advertising consultants, or advertising account representatives. Any document

in the possession of you, your affiliates, your agents or your employees is deemed to be within your possession or control. You have the affirmative duty to contact your agents, affiliates and employees and to obtain documentation from them, if such documentation is responsive to this subpoena.

- B. Unless otherwise indicated, documents to be produced pursuant to this subpoena should include all original documents prepared, sent, dated, received, in effect, or which otherwise came into existence at any time. If your "original" is a photocopy, then the photocopy would be and should be produced as the original.
- C. This subpoena duces tecum calls for the production of all responsive documents in your possession, custody or control without regard to the physical location of said documents.
- D. "And" and "or" are used as terms of inclusion, not exclusion.
- E. The documents to be produced pursuant to each request should be segregated and specifically identified to indicate clearly the particular numbered request to which they are responsive.
- F. In the event that you seek to withhold any document on the basis that is properly entitled to some privilege or limitation, please provide the following information:
 - a. A list identifying each document for which you believe a limitation exists;
 - b. The name of each author, writer, sender or initiator of such document or thing, if any;
 - c. The name of each recipient, addressee or party for whom such document or thing was intended, if any;
 - d. The date of such document, if any, or an estimate thereof so indicated if no date appears on the document;
 - e. The general subject matter as described in such document, or, if no such description appears, then such other description sufficient to identify said document; and
 - f. The claimed grounds for withholding the document, including, but not limited to, the nature of any claimed privilege and grounds in support thereof.
- G. For each request, or part thereof, which is not fully responded to pursuant to a privilege, the nature of the privilege and grounds in support thereof should be fully stated.

- H. If you possess, control or have custody of no documents responsive to any of the numbered requests set forth below, state this fact in your response to said request.
- I. For purposes of responding to this subpoena, the term "document" shall mean all writings or stored data or information of any kind, in any form, including the originals and all non identical copies, whether different from the originals by reason of any notation(s) made on such copies or otherwise, including, without limitation: correspondence, notes, letters, telegrams, minutes, certificates, diplomas, contracts, franchise agreements and other agreements, brochures, pamphlets, forms, scripts, reports, studies, statistics, inter-office and intra-office communications, training materials, analyses, memoranda, statements, summaries, graphs, charts, tests, plans, arrangements, tabulations, bulletins, newsletters, advertisements, computer printouts, teletype, telefax, microfilm, e-mail, electronically stored data, price books and lists, invoices, receipts, inventories, regularly kept summaries or compilations of business records, notations of any type of conversations, meetings, telephone or other communications, audio and videotapes; electronic, mechanical or electrical records or representations of any kind (including without limitation tapes, cassettes, discs, magnetic tapes, hard drives and recordings to include each document translated, if necessary, through detection devices into reasonably usable form).
- J. For purposes of responding to this subpoena, the term "affiliate" shall mean: a corporation, partnership, business trust, joint venture or other artificial entity which effectively controls, or is effectively controlled by you, or which is related to you as a parent or subsidiary or sibling entity. "Affiliate" shall also mean any entity in which there is a mutual identity of any officer or director. "Effectively controls" shall mean having the status of owner, investor (if 5% or more of voting stock), partner, member, officer, director, shareholder, manager, settlor, trustee, beneficiary or ultimate equitable owner as defined in Section 607.0505(11)(e), Dixie Statutes.
- K. The term "Dixie affiliates" shall mean those of your affiliates which do business in Dixie or which are licensed to do business in Dixie.
- L. If production of documents or other items required by this subpoena would be, in whole or in part, unduly burdensome, or if the response to an individual request for production may be aided by clarification of the request, contact the

Assistant Attorney General who issued this subpoena to discuss possible amendments or modifications of the subpoena, within five (5) days of receipt of same.

- M. Documents maintained in electronic form must be produced in their native electronic form with all metadata intact. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent that a responsive Document has been electronically scanned (for any purpose), that Document must be produced in an Optical Character Recognition (OCR) format and an opportunity provided to review the original Document. In addition, documents that have been electronically scanned must be in black and white and should be produced in a Group IV TIFF Format (TIF image format), with a Summation format load file (dii extension). DII Coded data should be received in a (Comma-Separated Values) CSV format with a pipe (I) used for multi value fields. Images should be single page TIFFs, meaning one TIFF file for each page of the Document, not one .tif for each Document. If there is no text for a text file, the following should be inserted in that text file: "Page Intentionally Left Blank." Moreover, this Subpoena requires all objective coding for the production, to the extent it exists. For electronic mail systems using Microsoft Outlook or LotusNotes, provide all responsive emails and, if applicable, email attachments and any related Documents, in their native file format (i.e., .pst for Outlook personal folder, .nsf for LotusNotes). For all other email systems, provide all responsive emails and, if applicable, email attachments and any related Documents in OCR and TIFF formats as described above.
- N. The relevant time period for the present request shall be from January 1, 2015 to present unless otherwise specifically stated.

YOU ARE HEREBY COMMANDED to produce at said time and place all documents, as defined above, relating to the following subjects:

1. Copies of all "Network Agreements" between the CPP and any law firm with offices located in the State of Dixie.
2. Copies of every document signed in any capacity by Cypress Zairn.
3. Copies of any and all underlying documentation that allows for your employee or ex-employee, Cypress Zairn to sign documents in any capacity for any lender and/or servicing company.

4. All policy and procedure manuals and/or training materials regarding the methods and timing that the CPP uses, including without limitation relating to the drafting and/or execution of foreclosure and mortgage related documents, including but not limited to Assignments of Mortgage, Satisfactions of Mortgage and Affidavits of any and all kind.
5. A list of all employees, dates of hire and termination, and their duties, including whether or not they provide any notary services for the CPP.
6. Ledgers of all financial transactions between the CPP and any title company, recording service, process server, or any other entity that provides payments to the CPP in connection with any services rendered in connection with any residential and/or commercial mortgage.
7. Ledgers of all financial transactions between the CPP and any title company, recording service, process server, or any other entity to whom the CPP provides payment(s) in connection with any services rendered in connection with any residential and/or commercial advertising.
8. Ledgers of all financial transactions between the CPP and any title company, recording service, process server, or any other entity to whom the CPP provides payment(s) in connection with any services rendered in connection with any political/personal travel, political/personal supplies, and political/personal debts.

WITNESS the DIXIE OFFICE OF THE ATTORNEY GENERAL in Tallahassee, Dixie, this 9th day of November, 2020.



Brandon Bruno (/u/ItsNotBrandon)
Acting Attorney General

NOTE: In accordance with the Americans with Disabilities Act of 1990, persons needing a special accommodation to participate in this proceeding should contact Brandon Bruno, Acting Attorney General at (954) 712-4600 no later than seven days prior to the proceedings.