

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED
DISTRICT COURT

OKLAHOMA COUNTY, OKLAHOMA

December 6, 2024 1:22 PM

RICK WARREN, COURT CLERK

Case Number CJ-2022-5066

Oklahoma Department of Securities)
ex rel. Melanie Hall, Administrator,)
)
Plaintiff,)
)
v.)
)
Premier Global Corporation et al.,)
)
Defendants.)

Case No. CJ-2022-5066

Judge Don Andrews


NOTICE OF AMENDED SUBPOENA DUCES TECUM

Please take notice that, pursuant to 12 O.S. § 2004.1, the Amended Subpoena Duces Tecum attached as Exhibit 1 will be served on the below-named witness to produce documents as follows:

WITNESS	PRODUCTION LOCATION	DATE & TIME
Settlements of Texas c/o Steptoe & Johnson 210 Park Avenue, Suite 2300 Oklahoma City, OK 73102	Spencer Fane LLP 9400 N. Broadway Ext. Suite 600 Oklahoma City, OK 73114	December 30, 2024 BY 12:00 PM

Dated this 6th day of December 2024.

Respectfully submitted,



Hilary S. Allen, OBA No. 16979

Spencer Fane LLP

9400 N. Broadway Ext., Suite 600

Oklahoma City, Oklahoma 73114

Telephone: (405) 844-9900

Facsimile: (405) 844-9958

Email: hallen@spencerfane.com

Attorney for the Receiver

CERTIFICATE OF MAILING

This is to certify that on this 6th day of December 2024, a true and correct copy of the above and foregoing was mailed, postage prepaid, to the following named counsel of record, to-wit:

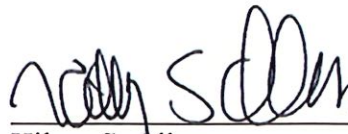
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*Attorney for Joshua Dane Owen and
Premier Marketing Management*



Hilary S. Allen

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities)	
<i>ex rel.</i> Melanie Hall, Administrator,)	
)	
Plaintiff,)	
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v.)	
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Premier Global Corporation et al.,)	
)	Case No. CJ-2022-5066
Defendants.)	Judge Don Andrews
)	

**AMENDED SUPBOENA DUCES TECUM TO PRODUCE AND PERMIT
INSPECTION AND COPYING OF DOCUMENTS**

STATE OF OKLAHOMA)	
)	ss.
COUNTY OF OKLAHOMA)	

TO: Settlements of Texas
c/o Steptoe & Johnson
210 Park Avenue, Suite 2300
Oklahoma City, OK 73102

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents, including electronically stored information, documents or tangible things at Spencer Fane, LLP located at 9400 N. Broadway Extension, Suite 600, Oklahoma City, Oklahoma 73114 on **December 30, 2024, at 12:00 p.m.**, or by mailing responsive materials at this address by that date.

The provisions of 12 O.S. § 2004.1 related to your protection as a person subject to a subpoena and relating to your duty to respond to this subpoena and the consequences of not doing so, are attached.*



DEFINITIONS

Unless otherwise specified or indicated by context, the following terms shall have the following meanings:

“Document” or “Documents” is used in its broadest sense and shall mean all documents, electronically stored information, and tangible things, including without limitation all writings and all other means of recording information, whether written, transcribed, taped, filmed, photographed, photostated, videoed, microfilmed, put on a CD ROM, tape backup, DVD, electronic file, portable hard drive, any other reproduction thereof, or in any other way produced, reproduced, or recorded, and including but not limited to: originals, drafts, computer-sorted and computer-retrievable information, copies and duplicates that are marked with any notation or annotation or otherwise differ in any way from the original, correspondence, letters, circular release, article, report, chart, accounting, memoranda, reports, notes, minutes, contracts, agreements, books, records, checks, vouchers, invoices, purchase orders, deposit slips, bank statements, stock certificates, bond coupons, purchase and/or commodities statements, financial statements, financial records, vouchers, bank checks and drafts, charge slips, hotel charges, receipts, freight bills, statistical records, cost sheets, abstracts of bids, stenographer’s notebooks, desk calendars, appointment books, time sheets, bulletins, studies, ledgers, diaries, logs, calendars, computer printouts, computer disks, card files, lists of persons attending meetings or conferences, transcripts, sketches, diagrams, calculations, evaluations, summaries, analyses, directions, work papers, press clippings, sworn or unsworn statements, requisitions, manuals or guidelines, audit work papers, financial analyses, tables of organizations, charts, graphs, indices, advertisements and promotional materials, audited and unaudited financial statements, trade letters, trade publications, catalogs, brochures, abstracts, pamphlets, notebooks, results of investigations, reviews, licenses, agreements, newspapers and newsletters, photographs, emails, electronic or mechanical records, facsimiles, telegrams and telecopies, audiotapes, computer input and output data, computer runs, worksheets or work papers, or any other materials similar to the above, including copies and drafts of such documents including addenda, supplements, amendments, revisions, exhibits and appendices. Each draft, annotated, or otherwise non-identical copy is a separate Document within the meaning of this term. Documents shall also include any removable sticky notes, flags, or other attachments affixed to any of the foregoing, as well as the files, folder tabs, and labels appended to or containing any documents. Documents expressly include all electronic records

“Communications” means any oral, written or electronic transmission of information, including but not limited to meetings, discussions, conversations, telephone calls, telegrams, memoranda, letters, text messages, instant messages, telecopies, telexes, conferences, social media exchanges, messages, notes or seminars and writings of any kind.

“Relating to” or “Relate to” means constituting, containing, concerning, embodying, reflecting, identifying, stating, mentioning, discussing, describing, evidencing, or in any other way being relevant to that given subject matter.

"You," "your," and "yourself" refers to Gable, Gotwals, and John Rusell. and each agent, representative, attorney and person acting or purporting to act on behalf of Gable Gotwal and John Russell.

"Receivership Entities" or any "Receivership Entity" means and includes each and all of the following: Premier Global Corporation, Premier Construction Services, Inc., Premier Construction Billing, Premier Construction Services, Inc., Premier Factoring, LLC., PF-2, LLC, PF-3, LLC, PF-4, LLC, PF-5, LLC, PF-6, LLC, PF-7, LLC, KCI Business Services, LLC., DDI Advisory Group, LLC, Steve Jonathan Parish, an individual; Richard Dale Dean, Premier Marketing Management, and Joshua Dane Owen, collectively unless specifically referred to separately herein.

"Person" shall refer to any natural person, firm, association, partnership, corporation or other form of legal business entity.

"Relation," "pertaining to," "relating to," "related to" or "related" mean pertaining in any way to, referring to, reflecting, recording, memorializing, mentioning, constituting, describing or concerning, directly or indirectly.

DOCUMENTS REQUESTED

1. Any and all documents, e-data, invoices, contracts, loan agreements, ledgers, monthly statements, billings, financial records, tax records, notes, letters, correspondence, canceled checks, relating to the accounts of Settlements of Texas, Inc., from 2018- present.
2. Any and all documents, e-data, invoices, contracts, loan agreements, ledgers, monthly statements, billings, financial records, tax records, notes, letters, correspondence, canceled checks, relating to loan(s) Mr. Dean or DDIA had with Settlements of Texas, Inc, from 2018-present.
3. Any and all documents, e-data, invoices, contracts, loan agreements, ledgers, monthly statements, billings, financial records, tax records, notes, letters, correspondence, canceled checks, relating to the \$61,500 payment to Kanza Bank that Mr. Dean claims was related to his home equity line of credit.
4. Any and all documents, e-data, invoices, contracts, fee agreements/letters of engagement, loan agreements, ledgers, monthly statements, billings, financial records, tax records,

notes, letters, correspondence, canceled checks, relating to Settlements of Texas hiring Steptoe & Johnson as counsel for Settlements of Texas, Inc., including the date of hire, for what purpose, billings, and payments relating to the same.

5. Any and all documents, e-data, invoices, contracts, fee agreements/letters of engagement, loan agreements, ledgers, monthly statements, billings, financial records, tax records, notes, letters, correspondence, canceled checks, relating to any expected or forecasted future income of Settlements of Texas, Inc.
6. All agreements between Settlements of Texas and the Receivership Entities since 2018 to the present.
7. Any and all documents, e-data, invoices, contracts, loan agreements, ledgers, monthly statements, billings, financial records, tax records, notes, letters, correspondence, canceled checks, relating to loan(s) Settlements of Texas, Inc, had with any of the Receivership Entities from 2018-present.
8. All documents that evidence, refer, or relate to any communications between Settlements of Texas and any of the Receivership Defendants.
9. All documents that are part of any file Settlements of Texas maintains or previously maintained for any of the Receivership Entities.
10. All Documents that evidence, refer, or Relate to any Receivership Entity including, without limitation, all Documents that were created, stored, or maintained in or for or on behalf of any Receivership Entity on behalf of Settlements of Texas within the Microsoft Office suite of programs or legal programs inclusive of Microsoft Outlook, Word, Teams, Excel, PowerPoint, One Note or One Drive. The Documents requested herein shall include any and all emails, account passwords, a listing of email addresses, together with all e-data,

instant messages, or other electronic communications and data, including any data stored on the cloud pertaining to all communications by or relating to each Receivership Entity.

11. Any and all documents e-data, invoices, contracts, fee agreements/letters of engagement, loan agreements, ledgers, monthly statements, billings, financial records, tax records, notes, letters, correspondence, canceled checks, relating to Settlements of Texas hiring K&L Gates as counsel for Settlements of Texas, Inc., including the date of hire, for what purpose, billings, and payments relating to the same.
12. All tax returns and filings by Settlements of Texas with applicable federal and state taxing authorities for the period of 2018 to present including, without limitation, Form 851, Form 1120, Form 1120S, Form 1065, Form W-3, Form 940, Form 941, Form 1099, Form 1099-NEC, Form 1099-Misc and each of the forgoing forms state law equivalents.

If you assert any privilege with respect to any document, for each such document: (1) identify it; (2) state the basis for the claim of privilege; (3) describe fully the circumstances of the document's origin; and (4) describe fully the circumstances of the document's disposition, including identifying all persons whom you believe have or may have seen it or become acquainted with its contents.

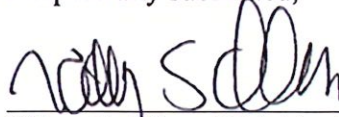
In order to allow objections to the production of documents and things to be filed, you should not produce them until the date specified in this subpoena, and if an objection is filed, until the Court rules on the objection.

Hereof Fail Not under penalty of law.

In witness hereof, I hereunto set my hand this 6th day of December 2024.

ISSUED this 6th day of December 2024.

Respectfully submitted,

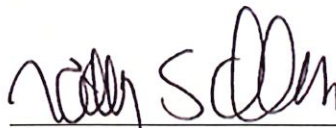


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Attorney for the Receiver

CERTIFICATE OF SERVICE

This will certify that a true and correct of the above and foregoing document was sent email and certified mail, postage prepaid on the 6th day of December 2024, to:

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