

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

DISTRICT COURT

OKLAHOMA COUNTY, OKLAHOMA

December 6, 2024 1:24 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 SECOND AMENDED SUBPOENA DUCES TECUM AND  
 DEPOSITION SUBPOENA TO RICHARD DEAN**

TO: Tara A. LaClair  
 Mary H. Tolbert  
 Aimee Majoue  
 Steptoe & Johnson, PLLC  
 210 Park Avenue, Suite 2300  
 Oklahoma City, OK 73102  
[Molly.tolbert@steptoe-johnson.com](mailto:Molly.tolbert@steptoe-johnson.com)  
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*Attorney for DDI Advisory Group, LLC and  
 Richard Dale Dean*

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

WITNESS	DEPOSITION LOCATION	DEPOSITION DATE & TIME
Richard Dean c/o Steptoe & Johnson	Steptoe & Johnson, PLLC 210 Park Avenue, Suite 2300 Oklahoma City, OK 73102	January 10, 2025 9:30 AM

Dated this 6<sup>th</sup> day of December 2024.

Respectfully submitted,



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Hilary S. Allen, OBA No. 16979  
Spencer Fane LLP  
9400 N. Broadway Ext., Suite 600  
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[Email: hallen@spencerfane.com](mailto:hallen@spencerfane.com)  
*Attorney for the Receiver*

**CERTIFICATE OF MAILING**

This is to certify that on this 6<sup>th</sup> 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:


Tara A. LaClair  
Mary H. Tolbert  
Aimee Majoue  
Steptoe & Johnson, PLLC  
210 Park Avenue, Suite 2300  
Oklahoma City, OK 73102  
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[Tara.laclair@steptoe-johnson.com](mailto:Tara.laclair@steptoe-johnson.com)  
[Aimee.majoue@steptoe-johnson.com](mailto:Aimee.majoue@steptoe-johnson.com)  
*Attorney for DDI Advisory Group, LLC  
and  
Richard Dale Dean*

Patricia A. Labarthe  
Shaun M. Mullins  
Brad Davenport  
Oklahoma Department of Securities  
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[smullins@securities.ok.gov](mailto:smullins@securities.ok.gov)  
[bdavenport@securities.ok.gov](mailto:bdavenport@securities.ok.gov)  
*Attorneys for Plaintiff*

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Clyde Edward Elkins*

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Company, LLC*

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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,	)	
	)	
v.	)	
	)	
Premier Global Corporation et al.,	)	
	)	Case No. CJ-2022-5066
Defendants.	)	Judge Don Andrews
	)	

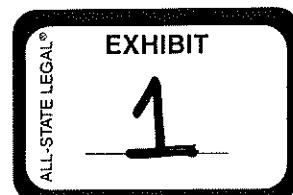
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**SECOND AMENDED SUBPOENA DUCES TECUM AND SUBPOENA FOR  
DEPOSITION TESTIMONY**

STATE OF OKLAHOMA	)	
	)	ss.
COUNTY OF OKLAHOMA	)	

TO: **Richard Dean**  
c/o Steptoe & Johnson  
210 Park Avenue, Suite 2300  
Oklahoma City, OK 73102

YOU ARE HEREBY COMMANDED pursuant to 12 O.S. § § 2004.1 and all other applicable authority, to appear on **Friday, January 10, 2025 at 9:30 AM** to testify as a witness in a deposition in the above-captioned case relating to the February 14, 2025, Show Cause and for Accounting hearing per the Court’s Order on October 28, 2024. The deposition will take place at Steptoe & Johnson law firm, located at 210 Park Avenue, Suite 2300 Oklahoma City, Oklahoma 73102, or such other location as mutually agreed by counsel, before an officer authorized to administer oaths by the laws of the State of Oklahoma and report oral deposition testimony.



YOU ARE FURTHER HEREBY COMMANDED by **December 20, 2024** to produce and permit inspection and copying of the following documents, including electronically stored information or tangible things, to be scanned and emailed to Spencer Fane LLP, at [mmacmillan@spencerfane.com](mailto:mmacmillan@spencerfane.com) and [hallen@spencerfane.com](mailto:hallen@spencerfane.com), the following requested documents:

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 Mr. Dean 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.

\***“Document”** shall refer to any written, recorded, electronically stored or graphic material or matter, whether typed, handwritten, printed, photographed, photostated, or microfilmed, and whether produced, reproduced or stored on papers, cards, tapes, belts, disks, or computer devices, or any other medium in your possession, custody or control or known by you to exist, and includes without limitation, all originals, copies of originals and prior drafts of each letter, correspondence, email, memorandum (inter-or intra-office as well as any other type), note telegram, message, release, article, analysis, summary, diary, record, brochure, contract, contract agreement, computer printout, table, chart, graph, schedule, book, journal, ledger, check, or other similar instrument, minute, purchase order and/or sales confirmation, invoice bills, monthly statements, bank records, loan applications, photograph, negative, film (whether developed or undeveloped), film strip, video tape, magnetic or other recorded tape, transcript, computer data, e-mails, and facsimilies.

\***“You”** and **“Your”** shall refer to Richard Dean, along with all affiliated/related persons, companies, entities, agents, representatives, employees, directors, officers, and other person(s) acting on behalf of or purporting to act on behalf of you or Settlements of Texas, Inc.

**In order to allow objection to the production of documents and things to be filed, you should wait at least 14 days (or until December 20, 2024) to produce the requested documents and if an objection is filed, until the court rules on the objection.**

### **C. PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.**

1. A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena.

The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney, or both, in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

2. a. A person commanded to produce and permit inspection, copying, testing or sampling of designated books, papers, documents, electronically stored information or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

b. Subject to paragraph 2 of subsection D of this section, a person commanded to produce and permit inspection, copying, testing or sampling or any party may, within fourteen (14) days after service of the subpoena or before the time specified for compliance if such time is less than fourteen days (14) days after service, serve written objection inspection, copying, testing or sampling of any or all of the designated materials or of the premises, or to producing electronically stored information in the form or forms requested. An objection that all or a portion of the requested material will or should be withheld on a claim that it is privileged or subject to protection as trial preparation materials shall be made within this time period and in accordance with subsection D of this section. If the objection is made by the witness, the witness shall serve the objection on all parties; if objection is made by a party, the party shall serve the objection on the witness and all other parties. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. For failure to object in a timely fashion, the court may assess reasonable costs and attorney fees or take any other action it deems proper; however, a privilege or the protection for trial preparation materials shall not be waived solely for a failure to timely object under this section. If objection has been made, the party serving the

subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

3. a. On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

(1) fails to allow reasonable time for compliance,

(2) requires a person to travel to a place beyond the limits allowed under paragraph 3 of subsection A of this section,

(3) requires disclosure of privileged or other protected matter and no exception or waiver applies,

(4) subjects a person to undue burden, or

(5) requires production of books, papers, documents or tangible things that fall outside the scope of discovery permitted by Section 3226 of this title.

b. If a subpoena:

(1) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(2) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena. However, if the party in whose behalf the



subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

**D. DUTIES IN RESPONDING TO SUBPOENA.**

1. a. A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

b. If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena shall produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

c. A person responding to a subpoena is not required to produce the same electronically stored information in more than one form.

d. A person responding to a subpoena is not required to provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. If such showing is made, the court may order discovery from such sources if the requesting party shows good cause, considering the limitations of subparagraph c of paragraph 2 of subsection B of Section 3226 of this title. The court may specify conditions for the discovery.

2. a. When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall

be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

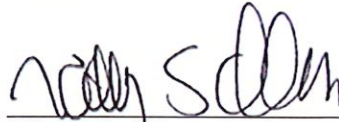
b. If information is produced in response to a subpoena that is subject to a claim or privilege or of protection as trial preparation material, the person making the claim may notify any party that received the information of the claim and the basis for such claim. After being notified, a party shall promptly return, sequester, or destroy the specified information and any copies the party has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, such shall take reasonable steps to retrieve the information. The person who produced the information shall preserve the information until the claim is resolved. This mechanism is procedural only and does not alter the standards governing whether the information is privileged or subject to protection as trial preparation material or whether such privilege or protection has been waived.

Hereof Fail Not under penalty of law.

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

ISSUED this 6<sup>th</sup> day of December 2024.

Respectfully submitted,



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Hilary S. Allen, OBA No. 16979  
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9400 N. Broadway Ext., Suite 600  
Oklahoma City, Oklahoma 73114  
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[Email: hallen@spencerfane.com](mailto:hallen@spencerfane.com)  
*Attorney for the Receiver*

**CERTIFICATE OF MAILING**

This is to certify that on this 6<sup>th</sup> 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:

Tara A. LaClair  
Mary H. Tolbert  
Aimee Majoue  
Steptoe & Johnson, PLLC  
210 Park Avenue, Suite 2300  
Oklahoma City, OK 73102  
[Molly.tolbert@steptoe-johnson.com](mailto:Molly.tolbert@steptoe-johnson.com)  
[Tara.laclair@steptoe-johnson.com](mailto:Tara.laclair@steptoe-johnson.com)  
[Aimee.majoue@steptoe-johnson.com](mailto:Aimee.majoue@steptoe-johnson.com)  
*Attorney for DDI Advisory Group, LLC and  
Richard Dale Dean*

  
\_\_\_\_\_  
Hilary S. Allen