UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA WEST PALM BEACH DIVISION

PUES FAMILY TRUST IRA, MICHAEL	
PUES EXECUTOR	
V.	

DIEGEANII VEDIGEIDA MIGIAEI

PARNAS HOLDINGS, INC, LEV PARNAS Case No. 19-MC-80024 DMM

Debtor.

JUDGMENT CREDITOR'S NOTICE OF SUBPOENAS

Judgment Creditor/Plaintiff PUES FAMILY TRUST IRA, by and through its undersigned counsel, hereby serves its Notice of Intent to Serve Subpoenas To Produce Documents in a Civil Action on 1) America First Action, Inc., and 2) Russell S. Jacobs, P.A., all pursuant to the Federal Rules of Civil Procedure in the above styled cause and attaches a copy of the subpoenas to be served upon the above referenced parties June 18, 2019 or as soon thereafter as service may be effectuated.

DATED on June 17, 2019

Respectfully submitted,

ANDRE LAW FIRM P.A.
Counsel for Plaintiff/Judgment Creditor
18851 N.E. 29th Ave Suite 724
Aventura, FL 33180
Tel. 786 708 0813
Fax 786 513 8408

By: /s/ Tony André

Tony André, Esq.

Florida Bar No.: 0040587

Case No. 19-MC-80024 DMM

CERTIFICATE OF SERVICE

I certify that on this 17th day of June 2019, I filed the foregoing with the Clerk of the Court and have served copies of this pleading via first class mail on the following parties, I also certify that I am admitted to the United States District Court for the Southern District of Florida:

Chris Draper, Esq. Greenspoon Marder 525 Okeechobee boulevard Suite 900 West Palm Beach FL 33401 Attorneys for Defendants

	/s/ Tony Andre
Tony Andre	•

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

United States District Court

for the

Florida	
Civil Action No.	19-80024-DMM
	ON, OR OBJECTS VIL ACTION
gency Global, Inc.	•
ermit inspection, c	opying, testing, or sampling of the
Date and Time:	
	ly 24, 2019 at 9:00 am
	,,,
nd location set fort	h below, so that the requesting party nated object or operation on it.
bpoena; and Rule 4	elating to the place of compliance; 45(e) and (g), relating to your duty to
OR	/s/ Tony Andre
	Attorney's signature
attorney representi	ng (name of party) ues or requests this subpoena, are:
	Date and Time: Operty or any desig Date and Time: Operty or any desig OR OR

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 19-80024-DMM

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

i icceived unis su	abpoena for (name of individual and title, if an	ny)	
late)	·		
☐ I served the si	ubpoena by delivering a copy to the nar	med person as follows:	
☐ I returned the	subpoena unexecuted because:	on (date) ;	or
		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
\$	·		
fees are \$	for travel and \$	for services, for a total of \$	0.00
i deciare under p	penalty of perjury that this information i	s true.	
ð:			
e:		Server's signature	
e:			
e:		Server's signature Printed name and title	
e:			

Additional information regarding attempted service, etc.:

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - **(B)** inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- **(B)** Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- **(C)** Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** *Information Produced.* If information produced in response to a subpoena is subject to a claim of 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 it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Exhibit A

Definitions

As used in this request, the following words shall be defined as follows:

"Document" includes, but is not limited to, originals where available, or 1) otherwise a carbon copy, Xerox copy or other copy, including each non-identical copy (whether different from the original because of marginal notes, or other material inserted or attached thereto, or otherwise) of each item of correspondence, letters, memoranda, messages, telephone bills, notes, offers, orders, confirmations, contracts, agreements, reports, punch sheets, punch lists, agendas, cables, telegrams, diaries, appointment books, invoices, ledgers, returns, accounts, checks, check stubs, drafts, statements, indexes, data sheets, data processing cards, logs, worksheets, service orders, expense vouchers, maintenance records, inspection reports, licenses, permits, settlement paperwork, printing, pictures, advertisements, slides, film, microfilm, micro fiche and other written matter of every kind and character; notes, memoranda, transcripts, recording tapes, recording disks or other records of oral communications; and graphs, books, charts, tables, prospectuses, tabulations, worksheets, compilations, summaries, minutes, lists, pamphlets, brochures, drawings, renderings, diagrams, sketches, etchings, tracings, plans, blueprints, posters, periodicals, publications, bulletins, computer printouts, studies, electronic mail, information contained in electronic or computer storage media and other papers in the possession, custody or control of America First Action, Inc. ("Deponent") or its officers, directors, agents, employees, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, including documents which were prepared by Deponent's officers, directors, agents, employees, affiliates,

subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, which did not leave the custody of the person preparing them.

- 2) "You" or "Your" refers to Deponent, its officers, directors, agents, attorneys, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, employees, representatives and any and all other persons acting for, purporting to act for, or subject to the control of Deponent, or its subsidiaries, parents, predecessors or successors.
 - 3) "And" or "Or" shall include the conjunctive as well as the disjunctive.
- 4) "Communications" include correspondence, discussions, telephone conversations and all other forms of written or oral communication.
 - 5) "Judgment debtor" refers to any of the following:
 - a) Parnas Holdings, Inc., FEIN: 27-3907290; and/or
- b) Lev Parnas, an individual, last known address: 7670 La Corniche
 Circle Boca Raton, FL 33433.

Schedule of Documents to be Produced

Any and all documents in your possession, custody or control that relate or reflect or refer to:

- 1. The wire transfer/contribution from Aaron Investments I, LLC and You, which purports to transfer \$325,000.00 from Aaron Investments I, LLC to You on May 17, 2018 (See redacted wire transfer information attached as Exhibit 1).
- 2. Any and all documentation, including correspondence, related to the attached wire that explains why You reported to the federal authorities the source of the funds wired were from third party Global Energy Producers, LLC (See attached Exhibit 2) and not Aaron Investments I, LLC the apparent source of the funds.
- 3. Correspondence between You and Judgment Debtor or his agents, or correspondence concerning Judgment Debtor or his agents related to business dealings with You, including but not limited to the subject \$325,000.00 contribution evidenced here.

3:55:11 PM

Wires Outgoing

SENT ORIGINATOR (TD BANK, NA SET UP A RATON FL SET UP BY FEE
-1 SENT ORIGINATOR (BENEFICIARY CHASE BANK NA 05/16/18 11:48AM AARON INVESTMENTS I, LLC FD IMPORT ANI CORP ABA 021000021 SET UP 05/16/18 21842 CYPRESS PALM CT 520 W RD STE 500 09:55AM BOCA RATON FL 33428 TARRYTOWN NY 10591 NY \$490,000.00 1 PHO 10591 NY \$490,000.00 STE 009145314382 B&P CHECKING ACCT# SP2349961 WATSON,MONET APPROVED BY P1267442 GONZALEZ,ADA P9367613 BO \$0.00 FEE 0659470659480364401114 FED # G0181362929901 GLOBAL ID	D EXPORT HITE PLAINS
SENT ORIGINATOR () BENEFICIARY () 05/17/18 02:25PM AARON INVESTMENTS I, LLC JETSMARTER INC AI SET UP 05/17/18 21842 CYPRESS PALM CT 500 EAST BROWARD BLVD STE 19 01:56PM BOCA RATON FL 33428 FT LAUDERALE FL 33394 \$12,950.00 1 PHONE 954-315-0050 0 B&P CHECKING ACCT# SET UP BY P2349961 WATSON,MO APPROVED BY P5037890 PERSAUD,NATERAM \$0.00 FEE INVOICE # 420180517B1Q8021C027208 FED # G0181373374901 GLOBAL ID	CA 009145314382 0NET
SENT ORIGINATOR BANK, NA 05/17/18 02:39PM AARON INVESTMENTS I, LLC AMERICA FIRST ACTION ABA 056009479 SET UP 05/17/18 21842 CYPRESS PALM CT 138 CONANT ST 21 01:47PM BOCA RATON FL 33428 BEVERLY MA 01915 V \$325,000.00 1 PHONE 914-774-6856 B&P CHECKING ACCT# SET UP BY P2349961 WATSON, MO APPROVED BY P5037890 PERSAUD, NATERAM P3028366 PALAJ, ARISTI \$0.00 FEE GLOBAL ENERGY PRODUCERS LLC 20180517B1Q8021C027774 FED # G0181373420401 GLOBAL ID	ON INC

Imagai 201807199 1716673 Ω 224-DMM Docume Exhibit 12 Entered on FLSD Docket 06/17/2019 Page 8 of 8

SCHEDULE A (FEC Form 3X) FEMIZED RECEIPTS	Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: PAGE 15 OF (check only one) X 11a
Any information copied from such Reports are for commercial purposes, other than using NAME OF COMMITTEE (In Full) AMERICA FIRST ACTION, II	Ind Statements may not be sold or used by any potential the name and address of any political committee NC.	erson for the purpose of soliciting contributions
Full Name of Individual (Last, First, Middle GLOBAL ENERGY PRODUCERS, L Mailing Address 7670 LA CORNICH CIRC	LC	Date of Receipt
City BOCA RATON	State Zip Code FL 33433	05 17 2018 Transaction ID : SA11Al.21241
FEC ID number of contributing federal political committee.	C	Amount of Each Receipt this Period 325000.00
Name of Employer (for Individual)	Occupation (for Individual)	Memo Item
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 325000.00	
FEC ID number of contributing federal political committee.	ame C	Date of Receipt 06 22 2018 Transaction ID : SA11Al.23666 Amount of Each Receipt this Period 100000.00
Hecelpt For: Primary General Other (specify) ▼	Occupation (for Individual) DIRECTOR Aggregate Year-to-Date ▼ 100000.00	Memo Item
	ne	Date of Receipt M M M
FEC ID number of contributing federal political committee.	C	Amount of Each Receipt this Period 50000.00
	Occupation (for Individual) ATTORNEY	Memo Item
Primary General Other (specify)	Aggregate Year-to-Date ▼ 50000.00	
SUBTOTAL of Receipts This Page (optional)	475000.00

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

United States District Court

for the

Southern District of Florida

Southern District of	Florida
Pues Family Trust IRA, Michael Pues Executor	
) Plaintiff	
V.)	Civil Action No. 19-80024-DMM
Parnas Holdings, Inc., and Lev Parnas	
)	
Defendant)	
SUBPOENA TO PRODUCE DOCUMENTS OR TO PERMIT INSPECTION OF PR	
Russell S. Jacobs, P.A. (DBA Jacobs Law Gro	
To: By Serving its Registered Age	
20700 West Dixie Highwa (Name of person to whom the	is subpoena is directed)
Production: YOU ARE COMMANDED to produce at t documents, electronically stored information, or objects, and to p material: See attached Exhibit A	he time, date, and place set forth below the following ermit inspection, copying, testing, or sampling of the
Place:	Date and Time:
Andre Law Firm P.A. 18851 N.E. 29th Ave Suite 724	July 24, 2019 at 9:00 am
Aventura, FL 33180	, ,
other property possessed or controlled by you at the time, date, as may inspect, measure, survey, photograph, test, or sample the pro	nd location set forth below, so that the requesting party operty or any designated object or operation on it.
Place:	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attach Rule 45(d), relating to your protection as a person subject to a surrespond to this subpoena and the potential consequences of not de Date:	opoena; and Rule 45(e) and (g), relating to your duty to
CLERK OF COURT	OR
	/s/ Tony Andre
Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-mail address, and telephone number of the a Pues Family Trust IRA, Michael Pues Executor Tony Andre, Esq., 18851 N.E. 29th Ave Suite 724 Aventura, FL 33	, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 19-80024-DMM

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

i icceived unis su	abpoena for (name of individual and title, if an	ny)	
late)	·		
☐ I served the si	ubpoena by delivering a copy to the nar	med person as follows:	
☐ I returned the	subpoena unexecuted because:	on (date) ;	or
		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
\$	·		
fees are \$	for travel and \$	for services, for a total of \$	0.00
i deciare under p	penalty of perjury that this information i	s true.	
ð:			
e:		Server's signature	
e:			
e:		Server's signature Printed name and title	
e:			

Additional information regarding attempted service, etc.:

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

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(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Exhibit A

Definitions

As used in this request, the following words shall be defined as follows:

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directors, agents, employees, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, attorneys or representatives, which did not leave the custody of the person preparing them.

- 2) "You" or "Your" refers to Deponent, its officers, directors, agents, attorneys, affiliates, subsidiaries, divisions, partners, parents, predecessors, successors, joint venturers, employees, representatives and any and all other persons acting for, purporting to act for, or subject to the control of Deponent, or its subsidiaries, parents, predecessors or successors.
 - 3) "And" or "Or" shall include the conjunctive as well as the disjunctive.
- 4) "Communications" include correspondence, discussions, telephone conversations and all other forms of written or oral communication.
 - 5) "Judgment debtor" refers to any of the following:
 - a) Parnas Holdings, Inc., FEIN: 27-3907290; and/or
- b) Lev Parnas, an individual, last known address: 7670 La Corniche Circle Boca Raton, FL 33433.

Schedule of Documents to be Produced

Any and all documents in your possession, custody or control that relate or reflect or refer to:

1. The wire transfer to Aaron Investments I, LLC made by you on or about May 15, 2018. See attached redacted wire transfer advice.

3:53:48 PM

Wires Incoming

TR UST -----

FC: 00037 ACCOUNT:
INVESTMENTS I, LLC
POSTED: 05/30/17 AMOUNT: 30,000.00
WELLS FARGO BANK N A
FEE: 0.00 SOFT ORIGINATOR: KYRYLO RECEIVED: 05/30/17 BENEFICIARY: AARON POSTED: 05/30/17 AMOUNT: 30,000.00 SENDING BANK: BAYEV WAIVED: NO GLOBAL REF #: F01715009BC301 OTHER REF #: 20170530I1B7031R02019220170530B1Q8021R03987510001 05/30/17 INCOMING MONEY TRANSFER INFORMATION PAGE: 894 RECEIVED: 12/18/17 BENEFICIARY: AARON FC: 00037 ACCOUNT: INVESTMENTS , LLC POSTED: 12/18/17 AMOUNT: 10,000.00 SENDING BANK: BANKUNITED FEE: 0.00 SOFT ORIGINATOR: WEHOLD LLC BANKUNITED | WAIVED: NO GLOBAL REF #: F01735201B5C01 OTHER REF #: 20171218F7B74M2C00001420171218B1Q8021R0070041000 ------RECEIVED: 01/12/18 BENEFICIARY: AARON FC: 00037 ACCOUNT:
INVESTMENTS I, LLC
WELLS FARGO BANK N A

RECEIVED: 01/12/18 BENEFICIARY: AARON
POSTED: 01/12/18 AMOUNT: 3,000.00 SENDING BANK:
FEE: 0.00 SOFT ORIGINATOR: AARON G PARNAS WAIVED: NO GLOBAL REF #: F018012035C001 OTHER REF #: 20180112I1B7033R00632220180112B1Q8021R0137601000 -----------RECEIVED: 01/23/18 BENEFICIARY: AARON FC: 00037 ACCOUNT:
INVESTMENTS , LLC
WELLS FARGO BANK N A

RECEIVED: 01/23/18 BENEFICIA
POSTED: 01/23/18 AMOUNT: 2,000.00 S
FEE: 0.00 SOFT ORIGINATOR: AARON G POSTED: 01/23/18 AMOUNT: 2,000.00 SENDING BANK: PARNAS WAIVED: NO GLOBAL REF #: F0180230613501 OTHER REF #: 20180123I1B7031R01342320180123B1Q8021R0248851000 -------FC: 00037 ACCOUNT:
INVESTMENTS I, LLC
WELLS FARGO BANK N A

RECEIVED: 01/30/18 BENEFICIARY: AARON
300.00 SENDING BANK:
FEE: 0.00 SOFT ORIGINATOR: AARON G PARNAS WAIVED: NO GLOBAL REF #: F01803000D7101 OTHER REF #: 20180130I1B7031R00015420180130B1Q8021R0034411000 -------FC: 00037 ACCOUNT: RECEIVED: 05/10/18 BENEFICIARY: AARON INVESTMENTS , LLC POSTE JPMORGAN CHASE BANK POSTED: 05/10/18 AMOUNT: 11,500.00 SENDING BANK: FEE: 0.00 SOFT ORIGINATOR: F D IMPORT & EXPORT WAIVED: NO GLOBAL REF #: F01813005C1001 OTHER REF #: 20180510B1QGC04C00468720180510B1Q8021R0235681000 -------FC: 00037 ACCOUNT: RECEIVED: 05/15/18 BENEFICIARY: AARON INVESTMENTS I, LLC POSTED: 05/15/18 AMOUNT: 1,260,329.80 SENDING BANK: CITIBANK FLORIDA FEE: 0.00 SOFT ORIGINATOR: RUSSELL S. JACOBS P.A. IOTA ACCOUN WAIVED: NO GLOBAL REF #: G0181354215201 OTHER REF #: 100 BANK TO BANK INFO: RUSSELL S JACOBS P A IOTA ACCOUNT DBA THE JACOBS LAW GROUPATTO RNEY