



U.S. Department of Justice

*United States Attorney  
District of Connecticut*

*Abraham Ribicoff Federal Building  
450 Main Street, Rm. 328  
Hartford, Connecticut 06103*

*(860) 947-1101  
Fax (860) 760-7979  
[www.usdoj.gov/usao/ct](http://www.usdoj.gov/usao/ct)*

October 24, 2013

VIA HAND DELIVERY  
Custodian of Records  
Hartford Public Schools  
960 Main Street, 8<sup>th</sup> floor  
Hartford, CT 06103

Re: Non-Disclosure of Subpoena

Dear Custodian of Records:

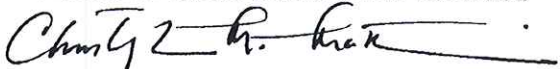
The attached grand jury subpoena issued on October 24, 2013 is returnable on November 14, 2013 before the federal grand jury sitting that date in Hartford, Connecticut.

The subpoena requests that the custodian of records produce certain documents described in Attachment A. In lieu of appearing before the grand jury, the Custodian of Records may comply with the subpoena by producing the responsive records to Special Agent Daniel O'Brien, Federal Bureau of Investigation, 530 Preston Avenue, Meriden, Connecticut, 06450, telephone number: 203-238-0505, [Daniel.Obrien@ic.fbi.gov](mailto:Daniel.Obrien@ic.fbi.gov) (email) on or before the Grand Jury date.

This subpoena has been issued as part of a federal grand jury investigation into the possible commission of a felony. We ask that you do not disclose, directly or indirectly, the fact that you have received this subpoena or your response to it. Although you are not required to comply with this request, disclosure may interfere with the investigation.

Very truly yours,

DEIRDRE M. DALY  
ACTING UNITED STATES ATTORNEY

  
CHRISTOPHER M. MATTEI  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
for the  
District of Connecticut

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Custodian of Records  
Hartford Public Schools  
960 Main Street, 8th floor  
Hartford, CT 06103

**YOU ARE COMMANDED** to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: United States District Court  
450 Main Street (Grand Jury Room 3rd floor)  
Hartford, CT 06103

Date and Time:

11/14/2013 9:30 am

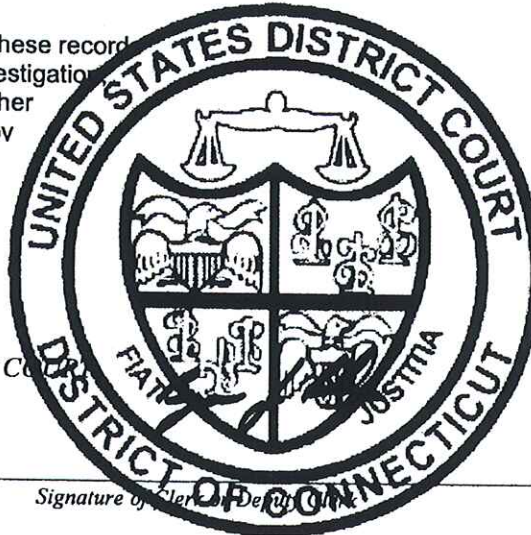
You must also bring with you the following documents, electronically stored information, or objects (*blank if not applicable*):

SEE ATTACHMENT

PLEASE NOTE: In lieu of personally appearing before the Grand Jury, these records may be provided to Special Agent Daniel O'Brien, Federal Bureau of Investigation, 530 Preston Avenue, Meriden, CT 06450, Tel. (203) 238-0505, or any other duly authorized Special Agent of the FBI, Email: Daniel.O'Brien@ic.fbi.gov on or before the grand jury date.

Date: 10/24/2013

CLERK OF COURT



Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Assistant U.S. Attorney Christopher M. Mattei  
450 Main Street, Room 328  
Hartford, CT 06103  
Tel. (860) 947-1101

Ch

H-13-1-32(3) CONTROL NO. 538

### PROOF OF SERVICE

This subpoena for *(name of individual or organization)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:



ATTACHMENT A - GRAND JURY - H-13-1-32(3) / #538

TO:

Custodian of Records  
Hartford Public Schools  
960 Main Street, 8<sup>th</sup> Floor  
Hartford, CT 06103

**DOCUMENTS REQUESTED:**

Unless otherwise noted, for the period January 1, 2011 through the present:

1. All documents, records and communications within your possession, custody and control, relating to Hybrid Insurance Group, including, but not limited to, the following:
  - a. Any and all records of financial transactions involving Hartford Public Schools ("HPS") and Hybrid Insurance Group, including checks, dates of payment, methods of payment and account information;
  - b. Any and all contracts, commitments, agreements, or memoranda of understanding between HPS and Hybrid Insurance Group, Starr Indemnity or National Casualty;
  - c. Any and all electronic mail relating to Hybrid Insurance Group and/or Earl O'Garro, including, but not limited to:
    - (i) Any and all electronic mail sent to or by Earl O'Garro or any employee or associate of Hybrid Insurance Group;
    - (ii) Any and all electronic mail sent to or by Paul Altieri relating to Hybrid Insurance Company, Earl O'Garro, Adam Cloud, Starr Indemnity and National Casualty;
    - (iii) Any and all electronic mail sent to or by John Griffin relating to Hybrid Insurance Company, Earl O'Garro, Adam Cloud, Starr Indemnity and National Casualty;
    - (iv) Any and all electronic mail sent to or by Christina Kishimito relating to Hybrid Insurance Company, Earl O'Garro, Adam Cloud, Starr Indemnity and National Casualty;

- (v) Any and all electronic mail sent to or by Matthew Poland relating to Hybrid Insurance Company, Earl O'Garro, Adam Cloud, Starr Indemnity and National Casualty.
- d. Any and all memoranda, minutes of meetings, internal reports, audits, inquiries, complaints, or reports of investigation relating to Hybrid Insurance Group or Earl O'Garro.

**INSTRUCTIONS**

1. "Documents and records" refers to all written or graphic matter, however produced or reproduced, or to any other tangible permanent record, and, without limitation, including, among other things, all letters, correspondence, communications (including email and emailed attachments), records, memoranda, minutes, notes, summaries, telephone records, books, schedules, reports, studies, appraisals, analyses, lists, interviews, books of account, telegrams, notes and minutes of meetings, interoffice communications, results of investigations, working papers, computer data, papers similar to any of the foregoing and other writings of every kind of description (whether or not actually used, and including drafts of all documents), and including not only originals of such documents but all photostatic, microfilmed or electronic copies in whatever form, and all sound records or electronic data compilations in whatever form.
2. "Communication" means any transmission or exchange of information between two or more persons, orally or in writing, and includes, without limitation, any conversation, contact or discussion, whether face-to-face or by means of telephone, telegraph, telex, electronic or other media, whether by chance or design.
3. A document within your "possession and control" includes not only those in your direct possession, but also those documents in the possession of another person or entity which you have the right to claim or possess, including any of the HPS officers, employees, agents, representatives, or attorneys. Accordingly, the HPS must designate, as "Custodian of Records," an officer or employee having personal and thorough knowledge of the HPS's records, who is to be responsible for the HPS's search for, and production of, responsive documents.
4. "Document(s) and Records" also includes all items which are subject to a claim of privilege. If any such documents or records are responsive to the subpoena, a privilege log must be produced as described in Paragraph 11.
5. Each page of any produced document should be identified in the lower right-hand corner by the initials "HPS" followed by a consecutive number, preferably marked in red or dark blue so that copies can be distinguished from original numbered documents.



6. On the subpoena return date, the Custodian is to appear before the Grand Jury, produce the documents called for, and be examined concerning the HPS's production.
7. No document called for by this subpoena shall be destroyed, modified, redacted, removed, or otherwise made inaccessible to the Grand Jury.
8. The conjunctions "and" and "or" are to be construed interchangeably in the manner that gives this subpoena schedule the broadest reading.
9. The singular form of a word shall be construed to include within its meaning the plural form of the word and vice versa and the use of any tense of any verb shall be considered to also include all other tenses in a manner that gives this subpoena schedule the broadest reading.
10. If the HPS has knowledge of any document that would be responsive to this subpoena schedule but has been lost, destroyed, or discarded, it shall identify to the extent possible each such document and provide an explanation of the loss, destruction, or discarding (including identification of each person authorizing or having knowledge of the loss, destruction or discarding).
11. If the HPS withholds from production any responsive document on the ground of any privilege, it shall list each such document by date, type, addressee, author (and if different, the preparer and signatory), general subject matter, number of pages, paragraph of the subpoena to which the document is responsive, and indicated or known circulation, including the names and titles of all persons to whom the document, or a copy thereof, or any part thereof, was shown. In addition, it shall indicate the privilege asserted with respect to each such document in sufficient detail to facilitate a determination of the validity of the claim of privilege. Any subpoenaed document withheld as privileged, or for any other reason not produced to the Grand Jury, shall be maintained by the HPS in a secure location.

Note: Please include a copy of this subpoena with any materials or records produced. In lieu of personally appearing before the Grand Jury, these records may be provided to Special Agent Daniel O'Brien Federal Bureau of Investigation, 530 Preston Avenue, Meriden, Connecticut, 06450, telephone number: 203-238-0505, Daniel.O'Brien@ic.fbi.gov (email) on or before the Grand Jury date.