

UNITED STATES DISTRICT COURT
for the
District of Connecticut

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Custodian of Records
Connecticut Department of Economic & Community Development
505 Hudson Street
Hartford, CT 06106

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*):

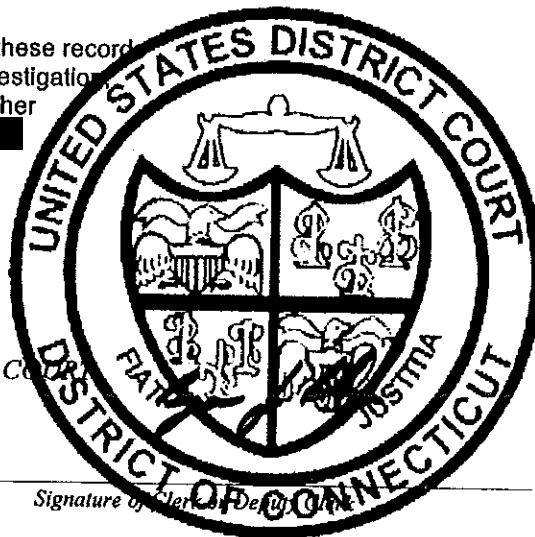
SEE ATTACHMENT

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: [REDACTED] on or before the grand jury date.

Note: Information not generally available to the public redacted.

Date: 10/24/2013

CLERK OF COURT



Signature of Clerk of Court

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. Mattel
450 Main Street, Room 328
Hartford, CT 06103
Tel. (860) 947-1101

H-13-1-32(2) CONTROL NO. 537

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(2) / #537

TO:

Custodian of Records
Connecticut Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106

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 any loan or grant awarded under the auspices of the Connecticut Department of Economic and Community Development ("DECD") to Hybrid Insurance Group, including, but not limited to, the following:
 - a. Any loan applications, financial statements, affidavits, attestations, and other records submitted to DECD by Hybrid Insurance Group;
 - b. Any and all records of financial transactions involving DECD and Hybrid Insurance Group, including checks or other disbursements, dates of payment, methods of payment and account information;
 - c. Any and all contracts, commitments, agreements, or memoranda of understanding between the DECD or any agency or sub-division thereof and Hybrid Insurance Group;
 - d. 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 or other communications sent to or by Adam Cloud or any employee of the Office of the Treasurer of the City of Hartford relating to Hybrid Insurance Company or Earl O'Garro;

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- (iii) Any and all electronic mail sent to or by Christopher Cloud or any employee of Camilliere, Cloud & Kennedy relating to Hybrid Insurance Company or Earl O'Garro;
 - e. Any and all memoranda, minutes of meetings, or internal reports, relating to Hybrid Insurance Group or Earl O'Garro.

ATTACHMENT A - GRAND JURY - H-13-1-32(2) / #537

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 COH officers, employees, agents, representatives, or attorneys. Accordingly, the COH must designate, as "Custodian of Records," an officer or employee having personal and thorough knowledge of the COH's records, who is to be responsible for the COH'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 "COH" 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 COH'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 COH 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 COH 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 COH 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, [REDACTED] (email) on or before the Grand Jury date.

Note: Information not generally available to the public redacted.