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SUZANNE M. DE MEYER  
NEW YORK  
NEW JERSEY

November 21, 2024

Honorable Lewis Liman  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Ruby Freeman and Wandrea' Moss v. Rudolph W. Giuliani*

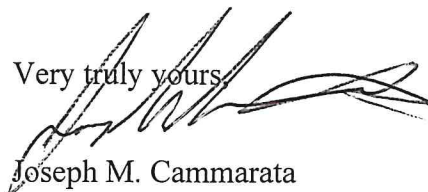
Dear Judge Liman,

As you know, I represent defendant Rudolph W. Giuliani in this matter. I do not have a cadre of attorneys as the Plaintiffs do. I was recently retained by the Defendant on November 15, 2024, less than a week ago. I have been working diligently to provide all responses for the discovery requested by the Plaintiffs. Annexed hereto are the responses to the information subpoena served by the Plaintiffs on Standard USA LLC.

Plaintiffs counsel set a noon deadline today for the responses to be remitted to Plaintiffs. I was in Court on four (4) matters this morning and returned to the office at approximately 2.:30 p.m. I can assure you I am doing everything possible to expedite discovery responses. I believe Your Honor can see the Defendant is getting bombarded by Plaintiffs counsel for document production, and we are doing everything to respond diligently.

Thank you very much,

Very truly yours,



Joseph M. Cammarata

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-0353

QUESTIONS IN CONNECTION WITH  
INFORMATION SUBPOENA TO  
STANDARD USA LLC

To: Standard USA LLC  
c/o Sunshine Corporate Filings LLC  
7901 4th Street N. Suite 300  
St. Petersburg, FL 33702

**INSTRUCTIONS**

This information subpoena seeks information during the period beginning December 1, 2020 through the present, unless some other time period is specified in a particular request. For purposes of this information subpoena, the term "Judgment Debtor" means Rudolph W. Giuliani. The term "Giuliani Affiliated Entities" includes Giuliani Communications LLC, Giuliani Partners LLC, Giuliani Security & Safety, LLC, Giuliani Group, LLC, Giuliani & Company LLC, Rudolph W. Giuliani PLLC, WorldCapital Payroll Corporation, Standard USA LLC, and any other entity in which you have reason to believe the Judgment Debtor has an interest, including any trust established by the Judgment Debtor or for the Judgment Debtor's benefit. The terms "you," "yourself," and "your" include you and any individual or entity acting on your behalf or in concert with you.

**REQUESTS**

1. State the amount of funds or property being held pursuant to the Restraining Notice served herewith.

2. Identify all individuals or entities with an interest in Standard USA LLC of any kind.

3. Identify with specificity any property in your possession, custody, or control in which the Judgment Debtor or any Giuliani Affiliated Entity has an interest, the nature of such interest, and the approximate value of such property.

4. Identify all property of any kind in which you have an interest of any kind.

5. Identify all financial accounts in which you have an interest of any kind, including the identity of the financial institution, the date the account was opened, the account number, the amount and nature of any assets held in the account, and the names of all authorized signers on the account, and if closed, the date on which the account was closed and the amount then on deposit.

6. Identify any entity in which you have an interest of any kind.

7. Identify any receivables in which you have an interest or contracts for payment in which you have an interest, of any kind and from any source.

8. Identify with specificity any financial accounts as to which you have ever shared ownership or control with the Judgment Debtor or any Giuliani Affiliated Entity, whether jointly, in trust, as trustee, as custodian, as nominee, as a beneficiary, and the dates that such ownership or control over such accounts was shared. As to each such account, list the financial institution at which the account is held, the exact name on the account, the date the account was opened, the account number, the names of the signatories on the account and the amount presently on deposit or, if closed, the amount on deposit when the account was closed.

9. Other than any accounts specified in response to the preceding question, are you aware of any financial account in which the Judgment Debtor or any Giuliani Affiliated Entity has an interest? Specify any such account, date the account was opened, the account number, the names

of the signatories on the account, the amount on deposit, and the source of your knowledge of the foregoing information.

10. Are you aware of any interest of the Judgment Debtor, whether direct or indirect, in any corporation, partnership, company, or other entity, other than the Giuliani Affiliated Entities defined herein? If so, state the nature of such interest and the source of your knowledge.

11. Identify any transfer of money (including in the form of salary, consulting fees, profit distribution, or otherwise), leases, deeds, securities, intangibles, receivables, or other property between the Judgment Debtor or any Giuliani Affiliated Entity and you, including (i) the parties to the transfer, (ii) the identity of the property transferred, (iii) where applicable, amounts transferred, (iv) the date of each transfer and (v) the consideration, if any, given in exchange for each transfer. Where the transfer was to or from an account at a bank, securities brokerage firm, or other financial institution, please set forth the name and address of the institution and the name and number on the account(s) from which and/or to which the transfer was made.

12. List any and all gifts given or loans extended between you and the Judgment Debtor or any Giuliani Affiliated Entity or any other entity in which you have reason to believe that the Judgment Debtor has an interest. For each such loan or gift, state the amount, date, terms, and written documentation if any..

13. Identify any debts owed between or among you and the Judgment Debtor or any Giuliani Affiliated Entity or any other entity in which the Judgment Debtor or a Giuliani Affiliated Entity has an interest. For each such debt, state the amount of the debt, the entity or individual to which the debt is owed, the nature of the debt, whether the debt is secured and if so by what collateral, and the terms of any agreement giving rise to the debt including: the interest rate, if any, the maturity date, if any, the repayment schedule, if any, and the amounts repaid, if any.

14. Do you have personal or professional access to any account in the name of the Judgment Debtor or any Giuliani Affiliated Entity, or any other entity in which the Judgment Debtor may have an interest, whether under the name of such entity, under a trade or corporate name, or in association with others? As to each such account, list the financial institution at which the account is held, the exact name on the account, the date the account was opened, the account number, the names of the signatories on the account and the amount presently on deposit or, if closed, the amount on deposit when the account was closed.

15. Identify with specificity any assets, including real or personal property, whether in the United States or any other country, you have ever shared with the Judgment Debtor or any Giuliani Affiliated Entity, whether jointly, in trust, as custodian, as nominee, or as a beneficiary, the dates those assets were shared, the reason the assets ceased being shared, and the disposition of those assets.

16. List any bank accounts, brokerage accounts, investment accounts, checking accounts, credit card accounts, and all other accounts, whether in the United States or any other country, of the Judgment Debtor or any Giuliani Affiliated Entity contained in your records, including all accounts on which the Judgment Debtor is a signatory or authorized user.

17. Have you provided the Judgment Debtor with a benefit, monetary or non-monetary? If so, please list the benefit, the date given, the reason given, and the approximate amount the benefit is worth.

18. Set forth the names and addresses of all the individuals who assisted or participated in providing information for, or formulating responses to, this Information Subpoena.

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Responding Entity: Standard USA LLC (“Responding Entity”)

Responses to information subpoena.

# 1- None.

# 2- Maria Ryan, Theodore Goodman and Rudolph Giuliani.

# 3- None.

# 4- Bank account and office equipment.

# 5- Bank accounts at IThink Financial Credit Union: Two accounts opened on September 27, 2024. Business savings account number 0700216850-S0400, amount of assets held in account are \$0. Business checking account number 0700216850-S0500, amount of assets held in account are approximately \$55,000. Authorized signers on the account: Maria Ryan and Ryan Medrano.

# 6 - None.

# 7- None.

# 8- None.

# 9- No.

# 10- No.

# 11- The following sums were paid to Rudolph Giuliani for services provided:

a. Payment of \$50,000.00 on October 24, 2024;

# 12- None.

# 13- None.

# 14- No.

# 15- None.

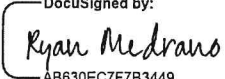
# 16- None.

# 17 – See answer above to # 11.

# 18 - Responding to this questions as the Respondent Entity. Ryan Medrano, 27 Maryland Plaza, Apt 1B, St. Louis, Missouri 63108 and Maria Ryan, 418 Walnut Street, Manchester, New Hampshire 03104.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge information and belief.

Dated: November 15, 2024

DocuSigned by:  
  
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\_\_\_\_\_  
Ryan Medrano, Comptroller of Responding Entity.