

[SAMPLE GRAND JURY SUBPOENA SCHEDULE: USE FOR DEALER WHO  
(1) SOLD LARGE NUMBER OF HIGH MILEAGE CARS TO SUBJECT/TARGET OR  
(2) BOUGHT LARGE NUMBER OF LOW MILEAGE CARS FROM SUBJECT/TARGET--  
has benefit of getting all documents at once; will want to  
interview concerning the individuals who acted on behalf of  
subject/target]

[DEALERSHIP NAME]  
[ADDRESS]

SUBPOENA ATTACHMENT

Instructions

1. You are to produce the original (or best copy where the original is not available) of each document described below.
2. You are to initial, date, and consecutively number the documents to be produced (these markings should, if possible, be placed in the lower right-hand corner of each document).
3. Unless otherwise stated, the relevant time period of this subpoena shall be from **[LIST RELEVANT TIME PERIOD]**.

Documents to be Produced

1. Documents sufficient to show the full legal name, principal office address, date of formation, place of formation, and form of organization (for example, corporation, partnership or individual proprietorship) of **[NAME OF DEALERSHIP RECEIVING SUBPOENA]**, its parent organizations, if any, and all subsidiaries or affiliates.
2. Any and all documents relating to any business dealings or other communications with or on behalf of any of the individuals appearing on Exhibit A attached to this subpoena,

doing business under any name; or with or on behalf of any of the entities listed on Exhibit A, including but not limited to, the following documents (where available, original records are to be provided):

- (a) all documents relating to any motor vehicle bought, sold, assigned, or otherwise transferred by or to you, on your behalf, or under your name (whether in a bona fide transaction or not) including, but not limited to, invoices, odometer statements, titles, reassignment of title forms, title applications, and police or other motor vehicle log books;
- (b) for those vehicles bought, assigned, or otherwise transferred to you by or on behalf of any of the individuals or entities listed on Exhibit A, the original check (if available), money order, or wire transfer used to purchase each vehicle;
- (c) for those vehicles sold, assigned, or otherwise transferred by you to or on behalf of any of the individuals or entities listed on Exhibit A, copies of the check, money order, or notice of wire transfer received as payment for each motor vehicle (if unavailable, provide documents sufficient to identify the date and account into which the check, money order, or wire transfer was deposited);
- (d) all documentation relating to any motor vehicle bought, sold, assigned, or otherwise transferred by or to you, on your behalf, or under your name (whether in a bona fide transaction or not) involving or on behalf of any of the individuals or entities listed on Exhibit A concerning which there has been any allegation or suggestion of either (i) odometer tampering, (ii) false odometer certification, (iii) any other kind of mileage discrepancy, or (iv) the use of any allegedly invalid or otherwise questioned certificate of title, such as a title appearing to contain an altered mileage figure or appearing to be a "washed" title (these documents should include all invoices and odometer statements relating to the

vehicles involved, all correspondence from or to either the complaining party or the party concerning whom the complaint was made, all notes of any conversations, all file records, and all other relevant documents);

- (e) any transfers of title documents (including reassignment of title documents such as **[fill in State Form--e.g., "New York MV-50s"]**) whether or not the transfer of documents involved actual sales of motor vehicles; and
- (f) any and all other documents (including, but not limited to, facsimile transmissions, letters, notes or memoranda of conversations, records or summaries of any meetings, conversations, or communications) that refer to, discuss, or in any way relate, in whole or in part, to the purchase, sale, assignment, or other transfer of motor vehicles or the odometer readings of motor vehicles involving any of the individuals or entities listed on Exhibit A.

EXHIBIT A

[LIST THE NAMES OF INDIVIDUALS AND ENTITIES UNDER INVESTIGATION]