

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, ex rel.
LETITIA JAMES, Attorney General of the State of New
York,

Petitioners-Judgment Creditors,

- *against* -

RICHMOND CAPITAL GROUP LLC, also doing
business as Ram Capital Funding and Viceroy Capital
Funding, and now known as RCG Advances LLC;
RAM CAPITAL FUNDING LLC; VICEROY
CAPITAL FUNDING INC., also doing business as
Viceroy Capital Funding; ROBERT GIARDINA,
individually and as a principal of RICHMOND
CAPITAL GROUP LLC, RAM CAPITAL FUNDING
LLC, and VICEROY CAPITAL FUNDING INC.;
JONATHAN BRAUN, also known as John Braun,
individually and as a principal of RICHMOND
CAPITAL GROUP LLC, RAM CAPITAL FUNDING
LLC, and VICEROY CAPITAL FUNDING INC.;
TZVI REICH, also known as Steve Reich,
individually and as a principal of RICHMOND
CAPITAL GROUP LLC, RAM CAPITAL FUNDING
LLC, and VICEROY CAPITAL FUNDING INC.; and
MICHELLE GREGG, individually and as a
principal of RICHMOND CAPITAL GROUP
LLC, RAM CAPITAL FUNDING LLC, and
VICEROY CAPITAL FUNDING INC.,

Respondents-Judgment Debtors.

Index No. 451368/2020

INFORMATION SUBPOENA

**THE PEOPLE OF
THE STATE OF NEW YORK**

TO: Simons HK Properties, LLC
c/o Claude Simon
254 Fifth Avenue, 3rd Floor
New York, NY 10001

AND

Simons HK Properties, LLC
c/o Claude Simon

71 Tonjes Road
Callicoon, NY 12723

Courtesy copy via email: claude@charleshenryproperties.com

WHEREAS, in a special proceeding in the Supreme Court of the State of New York in and for the County of New York, by the People of the State of New York, ex rel. LETITIA JAMES, Attorney General of the State of New York, as Petitioners-Judgment Creditors, against Richmond Capital Group LLC, Ram Capital Funding LLC, Viceroy Capital Funding Inc. d/b/a Viceroy Capital Funding and Viceroy Capital Funding LLC, Robert Giardina, Jonathan Braun, Tzvi Reich, and Michelle Gregg (collectively, “Respondents-Judgment Debtors”), who are the parties named in said proceeding, a judgment was entered on April 11, 2024, in favor of the Petitioners-Judgment Creditors, and against the Respondents-Judgment Debtors, in the amount of \$77,289,631.00, plus pre-judgment interest at the rate of 9% per annum from February 6, 2024, in the sum of \$1,238,751.62, for a total amount of \$78,528,382.62; and

WHEREAS, an appeal of the judgment entered on April 11, 2024, is currently pending in the Appellate Division of the New York Supreme Court, First Department under Index No. 2024-02969; however, no stay of enforcement has been granted pursuant to CPLR 5519, and the judgment remains fully enforceable;

WHEREAS, said judgment is remaining unpaid; and

WHEREAS, it is believed that Simons HK Properties, LLC (the “Producing Party” or “You”) is in possession of information relevant to the satisfaction of said judgment;

NOW, THEREFORE, WE COMMAND YOU to answer the within questions in writing under oath, separately and fully, each question in the original questionnaire accompanying this subpoena, a copy of which is attached, and to return the original questionnaire together with your answers to the undersigned in the prepaid addressed return envelope accompanying this subpoena

within seven (7) days of their receipt.

PLEASE TAKE FURTHER NOTICE that false swearing or failure to comply with this subpoena is punishable as contempt of court.

Dated: February 17, 2026

KELLNER HERLIHY GETTY & FRIEDMAN LLP

By: *Merielen Dal Ri Ziviani*
Merielen Dal Ri Ziviani

470 Park Avenue South-7th Floor

New York, NY 10016-6819

Telephone: 212-889-2121

Email: m.dalriziviani@khgflaw.com

*Attorneys for Petitioners-Judgment Creditors People
of the State of New York, ex rel. Letitia James,
Attorney General of the State of New York*

Enclosures: Question and Answer Form (original and copy)
Prepaid, addressed return envelope

3. For each person or entity identified in response to Questions 1 and 2, state:

a) Dates of occupancy;

b) The basis of occupancy (owner, tenant, subtenant, licensee, guest, other);

c) Whether such person or entity pays rent or other consideration.

4. State whether Tzvi (Steve) Reich has resided in, occupied, used, or had access to Unit 8 at any time from June 2020 to the present, and if so, state:

a) the dates of such residence, occupancy, use, or access; and

b) the basis for such occupancy or access (including but not limited to tenant, subtenant, licensee, guest, agent, corporate occupant, or otherwise).

5. State whether you, Simons HK Properties, LLC, or any managing agent, have had any business relationship, contractual relationship, lease, license, or other agreement with Tzvi (Steve) Reich.

6. If yes to Question 5, describe in detail:

a) The nature of the relationship;

b) The dates of the relationship;

c) All agreements entered into;

d) All payments made or received.

7. State whether you, Simons HK Properties, LLC, or the managing agent have had any lease, license, occupancy agreement, management agreement, rental arrangement or other relationship with:

a) Reich Holdings LLC;

b) Any entity owned, managed, or controlled by Tzvi (Steve) Reich;

c) Any entity acting on behalf of Tzvi (Steve) Reich.

8. State whether Unit 8 has been used, listed, advertised, or made available for short-term rental (including, but not limited to, Airbnb, Booking.com, or any similar platform) at any time from June 2020 to present.

9. If yes to Question 8, identify:

a) the platform(s) used;

b) the person or entity who created, managed, or controlled the listing;

c) the dates during which Unit 8 was offered or rented for short-term occupancy; and

d) the person or entity who received rental payments or other consideration in connection with such rentals.

