

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,

Index No. 451368/2020

Petitioners-Judgment Creditors,

**INFORMATION SUBPOENA**

- *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.

**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](mailto: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-7<sup>th</sup> Floor  
New York, NY 10016-6819  
Telephone: 212-889-2121

Email: [m.dalriziviani@khgflaw.com](mailto: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

**QUESTIONS AND ANSWERS MADE IN RESPONSE TO  
INFORMATION SUBPOENA**

**YOU ARE REQUIRED BY CPLR §§ 5223 AND 5224 TO RETURN YOUR ANSWERS  
ON THE ORIGINAL QUESTIONNAIRE IN THE PRE-PAID RETURN ENVELOPE  
WITHIN SEVEN (7) DAYS OF RECEIPT OF THIS SUBPOENA**

INSTRUCTIONS: You must set forth the information requested in full. If you need additional room, attach a separate sheet of paper and identify the item number to which it refers. If the answer is none, write "none" in the space provided. When you have completed your answers, sign the form in front of a notary public or other person authorized to administer oaths.

**QUESTIONS**

1. Identify all persons or entities who currently reside in, occupy, or have possession of Unit 8.

Man who said his name was "Steve Reich"

Benyomin Murik

2. Identify all persons or entities who have resided in, occupied, or had possession of Unit 8 at any time from June 2020 to the present, excluding the persons or entities identified in response to Question 1.

Claude Simon  
Carolyn Simon  
Charles Simon  
Henry Simon

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

a) Dates of occupancy;

May 2025 to Present  
Benyomin Murik  
"Steve Reich"

May 2014 to October 2024  
Claude Simon and Family

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

"Steve Reich"- guest of tenant  
Claude Simon and Family- Owner

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

"Steve Reich"-No  
Benyomin Murik-Yes  
Claude Simon and Family-NO

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:

Yes, person who identifies as "Steve Reich"

- a) the dates of such residence, occupancy, use, or access; and  
May 2025 To Present

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

Guest of Tenant

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.

No.

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;

No.

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

No.

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

Unknown

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.

No.

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.

Dated: February 24, 2026

Claude Simon

Name:

STATE OF Sullivan )  
COUNTY OF ny ) ss.:

On this 24<sup>th</sup> day of February, 2026 before me personally came Claude A. Simon, to me known, who, being by me duly sworn, did depose and state that he has read the foregoing responses to the information subpoena and that they are true and complete, to the best of his knowledge.

Kim E. Klein

Notary Public

KIM E. KLEIN  
Notary Public, State of New York  
Sullivan County Clerk's No. 336  
Commission Expires Feb. 27 2028