

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

ALYSSON MILLS, IN HER CAPACITY  
AS RECEIVER FOR ARTHUR LAMAR  
ADAMS AND MADISON TIMBER  
PROPERTIES, LLC,

*Plaintiff,*

v.

BUTLER SNOW LLP; BUTLER SNOW  
ADVISORY SERVICES, LLC; MATT  
THORNTON; BAKER, DONELSON,  
BEARMAN, CALDWELL & BERKOWITZ  
PC; ALEXANDER SEAWRIGHT, LLC;  
BRENT ALEXANDER; and JON  
SEAWRIGHT,

*Defendants.*

Case No. 3:18-cv-00866-CWR-BWR

**Hon. Carlton W. Reeves**

**NOTICE OF INTENT TO SERVE SUBPOENA**

Please take notice that consistent with this Court’s Memorandum Opinion and Order Granting Baker Donelson’s Motion for Investor Discovery, ECF No. 135, Baker, Donelson, Bearman, Caldwell & Berkowitz P.C. (“Baker Donelson”) intends to serve the attached subpoena upon Madison Timber and Alexander Seawright Timber Fund I, LLC (“ASTFI”) investors.<sup>1</sup>

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<sup>1</sup> At the Receiver’s request—and consistent with the Protective Order entered in the consolidated discovery action, *see* ECF No. 6 (3:22-cv-36)—Baker Donelson omits Investor PII from this notice, and thus provides here the form subpoena to be served, agreed upon with the Receiver. Baker Donelson will separately provide the Receiver a list of investors it intends to serve.

Dated this 25th day of November, 2024

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ PC**

/s/ Craig Singer

Craig D. Singer (*pro hac vice*)  
Benjamin W. Graham (*pro hac vice*)  
Hope E. Daily (*pro hac vice*)  
William M. Schmidt (*pro hac vice*)  
WILLIAMS & CONNOLLY LLP  
680 Maine Avenue, S.W.  
Washington, DC 20024  
Tel.: (202) 434-5000  
Fax: (202) 434-5029  
Email: csinger@wc.com

James J. Crongeyer, Jr. (MSB #10536)  
WATKINS & EAGER PLLC  
400 East Capitol Street, Suite 300 (39201)  
Post Office Box 650  
Jackson, MS 39205  
Tel.: (601) 965-1900  
Fax: (601) 965-1901  
Email: jcrongeyer@watkinseager.com

*Counsel for Defendant Baker, Donelson,  
Bearman, Caldwell & Berkowitz PC*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 25, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Craig Singer  
Craig D. Singer (*pro hac vice*)

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

ALYSSON MILLS, RECEIVER,

*Plaintiff*

v.

BUTLER SNOW LLP, ET AL., &  
THE UPS STORE, INC., ET AL.,*Defendant*

Civil Action No. 3:18-CV-866, 3:19-CV-364

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Investor

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Attachment A.

Place: Watkins & Eager  
400 East Capitol Street, Jackson, MS 39201  
jcrongeyer@watkinseager.com

Date and Time:

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*\_\_\_\_\_  
*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_, who issues or requests this subpoena, are:

Baker, Donelson, Bearman, Caldwell & Berkowitz PC; James J. Crongeyer, Jr., 400 East Capitol Street, Jackson, MS 39201; jcrongeyer@watkinseager.com; 601-965-1864  
The UPS Store, Inc.; LaToya C. Merritt, 1905 Community Bank Way, Suite 200, Flowood, MS 39232; latoya.merritt@phelps.com; 601-360-9749

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:18-CV-866, 3:19-CV-364

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
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: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_.

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.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

### **ATTACHMENT A TO SUBPOENA**

You are requested to locate, gather, and deliver all of the documents and information identified below that are in your possession, custody, or control. This request also includes documents and information within the possession, custody, or control of your spouse or other family members, your agents, or your attorneys, or other representatives.

The subpoena is separated into two parts: (I) requests for documents and (II) a questionnaire. Please respond to both parts.

If you have questions about a particular request below, please see the Definitions and Instructions below.

### **DEFINITIONS**

For purposes of this subpoena, the following definitions shall apply:

1. “**Adams**” refers to Arthur Lamar Adams.
2. “**Madison Timber**” refers to Madison Timber Company, Inc.; Madison Timber Properties, LLC; and any other entity that Adams controlled and was involved in the Ponzi Scheme.
3. The “**Ponzi Scheme**” is the Ponzi scheme operated by Adams through Madison Timber, as described in the criminal charges against Adams in *U.S. v. Adams*, No. 3:18-cr-00088-CWR-LRA (S.D. Miss. May 1, 2018).
4. The “**Receiver**” refers to Alysson Mills, in her capacity as the court-appointed receiver for estates of Adams and Madison Timber, as well as her attorneys, agents, and anyone else working on her behalf or direction, including Brent Barriere of the law firm Fishman Haygood, LLP, Lilli Evans Bass of the law firm Brown Bass & Jeter, PLLC, and Kristen Amond formerly of the law firm Mills & Amond, LLP.
5. The term “**ASTFI**” refers to Alexander Seawright Timber Fund I, LLC.

6. The term “**federal or state authorities or agencies**” includes without limitation the Federal Bureau of Investigation, the United States Securities and Exchange Commission, the United States Attorney’s Office for the Southern District of Mississippi, the United States Probation Office, the Internal Revenue Service, the United States Secret Service, the Mississippi Attorney General’s Office, the Mississippi Secretary of State’s Office, the Mississippi Department of Banking and Consumer Finance, or any Mississippi District Attorneys’ Office(s).

7. The term “**person**” means any individual or any entity, including corporations, proprietorships, partnerships, joint ventures, consortiums, clubs, associations, unions, foundations, government agencies or instrumentalities, societies, or any other group.

8. The term “**intermediary**” means any person or entity with whom or through which you dealt in order to invest in or lend money to Madison Timber, the Ponzi Scheme, or Adams. Intermediary would include any persons who solicited, facilitated, or assisted your investment or loan with Madison Timber, the Ponzi Scheme, or Adams, whether directly or through a separate company or entity of any kind.

8. The term “**documents**” has the broadest meaning possible under the Federal Rules of Civil Procedure, including Rule 34, and the Federal Rules of Evidence, and includes both paper and electronic documents and data of any kind.

9. The term “**communications**” means any transmission, exchange, or transfer of information from one person to another, including by letter, memorandum, personal meeting, telephone, telegraph, radio, facsimile, electronic mail, text message, social media (e.g., Facebook Messenger, WhatsApp), or any other means.

10. The term “**relate to**” means in whole or in any part alluding to, responding to, concerning, relating to, connected with, involving, commenting on, in respect of, about,



associated with, discussing, evidencing, showing, describing, reflecting, analyzing, summarizing, memorializing, consisting of, constituting, identifying, stating, tending to support, tending to discredit, referring to, or in any way touching upon.

11. As used herein, the words “**and**” and “**or**” shall be construed both conjunctively and disjunctively, and each shall include the other wherever such dual construction will serve to bring within the scope of the Request any document or information that would otherwise not be brought within its scope.

12. As used herein, the word “**including**” should be read inclusively and should not be read to limit or narrow the request to the enumerated items.

13. As used herein, the singular form shall include the plural and vice versa wherever such dual construction will serve to bring within the scope of the Request any document or information that would otherwise not be brought within its scope.

14. The term “**original**” as used herein does not refer to any copy, photocopy, scan, facsimile, image, photograph, print or other reproduction of a document.

### **INSTRUCTIONS**

1. In light of ongoing claims and actions brought by the Receiver, please retain and do not destroy any documents, originals or copies, that relate to Adams or Madison Timber or the Ponzi Scheme.

2. In lieu of production to the address listed above, you may email all written responses and documents produced in response to these Requests to James Crongeyer (jcrongeyer@watkinseager.com) and to LaToya Merritt (latoya.merritt@phelps.com).

3. A protective order has been entered by the court to protect confidential information. This protective order is applicable to any documents produced in response to this subpoena and

you may designate such documents as “CONFIDENTIAL” if allowed by the terms of the protective order, a copy of which is enclosed with this subpoena for your reference.

4. These requests call for the production of all responsive documents and electronically stored information in the possession, custody, control of, or available to, you, your spouse, your family members, and your attorneys, employees, officers, directors, representatives, accountants, auditors, agents, bankers, brokers, subsidiaries, affiliates, investigators, consultants, experts, witnesses, or other persons or entities acting on your behalf, in your employment, or under your direction or control or the direction or control of your representatives.

5. If a request read literally requires the production of a part or portion of a document or electronically stored information, production of the entire document or electronically stored information is requested.

6. If you deem any document requested by any of the following requests to be protected from disclosure by the attorney-client privilege, work-product doctrine, or any other privilege, doctrine, or immunity, please identify or describe: (i) the information, document, or communication alleged to be so protected by author, subject matter, and date; (ii) the names of all recipients of the information, document, or communication; and (iii) all bases upon which such protection rests.

7. Absent a separate written agreement or order of the court with regard to the form of production of electronically stored information, all electronically stored information should be produced in the form in which it is ordinarily maintained (i.e., native format) with all metadata intact.

8. If there is any question as to the meaning of any part of these Requests, or an issue as to whether production of any documents requested herein would impose an undue burden on

you, please promptly email or call James Crongeyer to discuss these matters, and you should respond to the remainder of these Requests as written.

9. If no documents exist that are responsive to a Request, or if no such documents are in your possession, custody, or control, so state in writing.

10. If you previously produced documents to the Receiver **and** if you have in your possession, custody, or control no documents responsive to **any of the below Requests** other than those previously provided to the Receiver, in lieu of re-producing those documents to the address listed above or by email to James Crongeyer, you may complete the sworn declaration attached as Exhibit A. Before doing so, you **must** perform a diligent search for any additional documents not previously produced to the Receiver that may be responsive to any of the requests in this subpoena. If you possess any responsive documents that were not already produced to the Receiver, you should produce those documents now in response to this subpoena. The attached declaration addresses only your responsibilities under Part I of this subpoena (“Requests for Documents”); even if you complete the declaration, you should also still complete Part II (“Questionnaire”).

11. If any Request cannot be responded to fully, provide as full a response as possible, state the reason for the inability to answer fully, and provide any information, knowledge, or belief that you have regarding the unanswered portion.

12. If any document responsive to these Requests was, but no longer is, in your possession, custody, or control, please identify that document and the person to whom you gave that document and/or who now has possession, custody, or control of that document.

13. If any Request is deemed to call for documents that have been lost, destroyed or discarded, please furnish an inventory containing the following information: (a) the type of

document (e.g., letter, memorandum, handwritten notes); (b) the title, date, number of pages, and author of the document, if applicable; (c) the names of any other persons who participated in the preparation of the document, if applicable; (d) the addressee and the names of any other recipients of the document, if applicable; (e) the subject matter of the document, if applicable; (f) the date on which the document was lost, destroyed, or discarded; (g) the names of the persons ordering, authorizing, participating in or with knowledge of such loss, destruction, or discarding; and (h) the reason or cause of the loss, destruction, or discarding.

14. These Requests do not seek any post-appointment communications between you and the Receiver. To the extent a Request as formulated could encompass post-appointment communications between you and the Receiver, you need not produce those communications.

**I. REQUESTS FOR DOCUMENTS**

1. All documents reflecting or relating to your investments with Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber, including any promissory notes, security agreements, timber deeds, title reports or opinions or certificates, bank statements, checks, or communications.

2. All documents reflecting or relating to any meeting, discussion, or other communication with Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

3. All documents reflecting or relating to your decision to invest with, or lend money to, or to stop investing with or lending money to Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber, including any communications with family members, financial advisors, bankers, accountants, or any other professionals.

4. All communications between you and any other Madison Timber investor about Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

5. All documents reflecting or relating to any losses you believe you have incurred because of your investment with Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

6. If your investment with Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber was through a limited liability company, trust, corporation, limited liability partnership, or any other entity, then:

a. all documents that reflect the identity of the members, managers, trustees, owners, directors, officers, partners, trustees, administrators, of any such investing entity at the

time of each investment, including documents reflecting the ownership percentages of all people who held an interest in such entity;

b. all documents that name, identify, or list the people who owned an interest in any such investing entity and their ownership percentages; and

c. all corporate organization documents and meeting minutes of any such investing entity.

7. If any member of your family or household or a friend or acquaintance participated in any way in your investment in Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber, all documents that relate to that person's participation in the investment, including all communications in which that person participated, related to the investment, Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

8. All documents you have received from, or provided to, any federal or state authorities or agencies that relate to Adams, Madison Timber, the Ponzi Scheme, ASTFI, or any intermediary for Adams or Madison Timber.

9. All documents that memorialize, constitute, or relate to any oral or written statement given to any federal or state authorities or agencies that relate to Adams, Madison Timber, the Ponzi Scheme, ASTFI, or any intermediary for Adams or Madison Timber.

10. All documents that you have received from or provided to any person in connection with the following court actions in the United States District Court for the Southern District of Mississippi: (a) *SEC v. Adams, et al.*, Case No. 3:18-cv-252; (b) *U.S. v. Adams*, No. 3:18-cr-88; (c) *U.S. v. McHenry*, No. 3:19-cr-20; (d) *Mills v. Butler Snow, et al.*, No. 3:18-cv-866; (e) *Mills v. Michael D. Billings, et al.*, No. 3:18-cv-679; (f) *Mills v. BankPlus, et al.*, No. 3:19-cv-196; (g) *Mills*

*v. Trustmark, et al.*, No. 3:19-cv-941; (h) *Mills v. Stuart Anderson, et al.*, No. 3:20-cv-427; (i) *Mills v. The UPS Store, Inc., et al.*, No. 3:19-cv-364; (j) *U.S. v. Alexander*, 3:20-cr-31; or (k) *U.S. v. Seawright*, 3:21-cr-7.

11. All communications between you and any other Madison Timber investor about the Madison Timber Receivership or the court actions identified in Request No. 10.

12. All documents reflecting or relating to any communications with any of the persons or entities against which the Receiver has asserted claims in the court actions identified in Request No. 10, including any employee or other agent of any such person or entity, relating to Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

13. All documents reflecting or relating to any communications you had with any banker, accountant, financial advisor, or other professional regarding your investment with Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

14. All invoices you received from any attorney from whom you sought advice related to your investment with Adams, Madison Timber, ASTFI, or any intermediary for Adams or Madison Timber.

## **II. QUESTIONNAIRE**

Please answer the following questions fully and accurately to the best of your recollection.

**What is your full name and address?**

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**What is your profession or occupation?**

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**What is your highest level of education obtained, including the degree and institution?**

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**Did you hold any professional licenses when you made your first contribution to Madison Timber? If so, which?**

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**At the time you made contributions to Madison Timber, were you an accredited investor?**

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**How did you first learn about Madison Timber?**

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**How much money did you contribute to Madison Timber?**

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**How much money did you receive in payments from Madison Timber (including both principal and interest)?**

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**On which dates did you contribute money to Madison Timber?**

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**Which specific people or companies did you give your money to?**

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**Did you make your contribution in your name or someone else's (e.g., a spouse, a company, a trust, etc.)? If someone else, who?**

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**What documents did you receive relating to Madison Timber?**

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**Did you communicate with any of these individuals about Madison Timber?**

	Yes	No		Yes	No
Alysson Mills	<input type="checkbox"/>	<input type="checkbox"/>	Jon Seawright	<input type="checkbox"/>	<input type="checkbox"/>
Arthur Lamar Adams	<input type="checkbox"/>	<input type="checkbox"/>	Jud Watkins	<input type="checkbox"/>	<input type="checkbox"/>
Austin Elsen	<input type="checkbox"/>	<input type="checkbox"/>	Martin Murphree	<input type="checkbox"/>	<input type="checkbox"/>
Bennie Butts	<input type="checkbox"/>	<input type="checkbox"/>	Matt Thornton	<input type="checkbox"/>	<input type="checkbox"/>
Brent Alexander	<input type="checkbox"/>	<input type="checkbox"/>	Michael D. Billings	<input type="checkbox"/>	<input type="checkbox"/>
Chandler Westover	<input type="checkbox"/>	<input type="checkbox"/>	Stewart Patridge	<input type="checkbox"/>	<input type="checkbox"/>
Courtney Herring	<input type="checkbox"/>	<input type="checkbox"/>	Stuart Anderson	<input type="checkbox"/>	<input type="checkbox"/>
Diane Lofton	<input type="checkbox"/>	<input type="checkbox"/>	Tammie Elsen	<input type="checkbox"/>	<input type="checkbox"/>
Gee Gee Patridge	<input type="checkbox"/>	<input type="checkbox"/>	Tammy Vinson	<input type="checkbox"/>	<input type="checkbox"/>
James Shell	<input type="checkbox"/>	<input type="checkbox"/>	Terry Wayne Kelly	<input type="checkbox"/>	<input type="checkbox"/>
Jason Cowgill	<input type="checkbox"/>	<input type="checkbox"/>	William ("Bill") McHenry	<input type="checkbox"/>	<input type="checkbox"/>
Jeannie Chisholm	<input type="checkbox"/>	<input type="checkbox"/>			

**Did you communicate with any other investors in Madison Timber or any other individuals not listed (including any attorney, accountant, tax professional, banker, broker, or investment advisor)? If so, who?**

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**Did you recommend Madison Timber to anyone? If so, to whom?**

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**Did you communicate with any of these entities about Madison Timber?**

	Yes	No		Yes	No
Alexander Seawright, LLC	<input type="checkbox"/>	<input type="checkbox"/>	First South Investments LLC	<input type="checkbox"/>	<input type="checkbox"/>
American Casualty Company of Reading PA	<input type="checkbox"/>	<input type="checkbox"/>	Herring Ventures LLC	<input type="checkbox"/>	<input type="checkbox"/>
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC	<input type="checkbox"/>	<input type="checkbox"/>	Kelly Management LLC	<input type="checkbox"/>	<input type="checkbox"/>
Bankplus	<input type="checkbox"/>	<input type="checkbox"/>	MDB Group LLC	<input type="checkbox"/>	<input type="checkbox"/>
Bankplus Wealth Management	<input type="checkbox"/>	<input type="checkbox"/>	Mutual of Omaha Insurance Company	<input type="checkbox"/>	<input type="checkbox"/>
Butler Snow Advisory Services LLC	<input type="checkbox"/>	<input type="checkbox"/>	Mutual of Omaha Investor Services, Inc.	<input type="checkbox"/>	<input type="checkbox"/>
Butler Snow LLP	<input type="checkbox"/>	<input type="checkbox"/>	Rawlings & MacInnis, PA	<input type="checkbox"/>	<input type="checkbox"/>
Continental Casualty Company	<input type="checkbox"/>	<input type="checkbox"/>	Riverhills Bank	<input type="checkbox"/>	<input type="checkbox"/>
Federal Insurance Company	<input type="checkbox"/>	<input type="checkbox"/>	Shell Investments LLC	<input type="checkbox"/>	<input type="checkbox"/>
			Southern Bancorp Bank	<input type="checkbox"/>	<input type="checkbox"/>
			The UPS Store Inc.	<input type="checkbox"/>	<input type="checkbox"/>
			Trustmark National Bank	<input type="checkbox"/>	<input type="checkbox"/>

**Which people at these entities did you communicate about Madison Timber with?**


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**Please state whether you received a Timber Deed relating to Madison Timber and, if so, the date, grantor, and grantee for each such Timber Deed.**

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**Please state whether you received a Timber Deed before or after you contributed money to Madison Timber.**

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**What name, if any, appears to be identified as the notary public for any Timber Deeds relating to Madison Timber that you received? Check all that apply.**

	Yes	No		Yes	No
Austin Elsen	<input type="checkbox"/>	<input type="checkbox"/>	Tammie Vinson	<input type="checkbox"/>	<input type="checkbox"/>
Chandler Westover	<input type="checkbox"/>	<input type="checkbox"/>	Tammie Elsen	<input type="checkbox"/>	<input type="checkbox"/>
Courtney Herring	<input type="checkbox"/>	<input type="checkbox"/>	Other	<input type="checkbox"/>	<input type="checkbox"/>
Diane Lofton	<input type="checkbox"/>	<input type="checkbox"/>	No notarization apparent	<input type="checkbox"/>	<input type="checkbox"/>
Jeannie Chisholm	<input type="checkbox"/>	<input type="checkbox"/>			

**Have you sold or assigned your legal claims relating to Madison Timber to anyone? If so, who?**

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**Did an attorney or anyone else assist you in preparing your responses to this questionnaire? If so, who?**

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on

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*Date*

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*Signature*

## **Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

ALYSSON MILLS, IN HER CAPACITY AS  
RECEIVER FOR ARTHUR LAMAR ADAMS  
AND MADISON TIMBER PROPERTIES,  
LLC,

*Plaintiff,*

v.

BUTLER SNOW LLP; BUTLER SNOW  
ADVISORY SERVICES, LLC; MATT  
THORNTON; BAKER, DONELSON,  
BEARMAN, CALDWELL & BERKOWITZ  
PC; ALEXANDER SEAWRIGHT, LLC;  
BRENT ALEXANDER; and JON  
SEAWRIGHT,

*Defendants.*

**Hon. Carlton W. Reeves, District Judge  
Hon. Bradley W. Rath, Magistrate Judge**

Case No. 3:18-cv-866-CWR-BWR

ALYSSON MILLS, IN HER CAPACITY AS  
RECEIVER FOR ARTHUR LAMAR ADAMS  
AND MADISON TIMBER PROPERTIES,  
LLC,

*Plaintiff,*

v.

THE UPS STORE, INC.; HERRING  
VENTURES, LLC d/b/a THE UPS STORE;  
AUSTIN ELSER; TAMMIE ELSER;  
COURTNEY HERRING; DIANE LOFTON;  
CHANDLER WESTOVER; RAWLINGS &  
MACINNIS, PA; TAMMY VINSON; and  
JEANNIE CHISHOLM,

*Defendants.*

Case No. 3:19-cv-364-CWR-BWR

Arising out of Case No. 3:18-cv-252, *Securities  
and Exchange Commission v. Arthur Lamar  
Adams and Madison Timber Properties, LLC*



**INVESTOR DECLARATION REGARDING DOCUMENTS**

I, \_\_\_\_\_, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a person of the full age of majority, residing at \_\_\_\_\_ . I, on behalf of myself or an entity in which I have an interest, invested in Madison Timber Properties, LLC (“Madison Timber”). I submit this declaration in response to the document requests contained in the subpoena issued to me by Defendants in the above-captioned cases (the “Subpoena”).

2. I have provided to Alysson Mills, in her capacity as Receiver for Arthur Lamar Adams and Madison Timber (the “Receiver”), all documents in my possession which I understand are responsive to any of the document requests in the Subpoena.

3. Specifically, I provided the Receiver with the following documents, each of which is identified and listed here (or on attached pages): \_\_\_\_\_

4. I have conducted a diligent search for additional documents responsive to the Subpoena and have confirmed to the best of my knowledge that I do not have any additional documents in my possession that are responsive to any of the requests in the Subpoena other than the documents I have already provided to the Receiver.

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name