

IN THE CIRCUIT COURT OF THE 11th JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

MICCOSUKEE TRIBE OF INDIANS
OF FLORIDA, a sovereign nation and
federally-recognized Indian Tribe,

Case No.: 12-12816-CA-27

Plaintiff,

v.

GUY LEWIS, ESQUIRE and
MICHAEL TEIN, ESQUIRE, Individually,
and LEWIS TEIN, PL, a law firm and
professional association

Defendants.



MICCOSUKEE TRIBE OF INDIANS OF FLORIDA'S
FIRST REQUEST TO PRODUCE TO DEFENDANT, GUY LEWIS, ESQ.

COMES NOW the Plaintiff, MICCOSUKEE TRIBE OF INDIANS OF FLORIDA (hereinafter, "the Miccosukee Tribe"), by and through its undersigned counsel and pursuant to Florida Rule of Civil Procedures of 1.350, requests the Defendant, GUY LEWIS, ESQUIRE (hereinafter, "ATTORNEY LEWIS"), to produce the following items at the undersigned counsel's office within thirty (30) days from the date of service of this Request to Produce.

1. All records correspondence, letters of resignation, notes, files, administrative decisions and memoranda showing your termination of

employment with the Executive Office for United States Attorneys and the United States Department of Justice due to fraud, travel malfeasance and/or any other improper conduct while you were employed by the United States Department of Justice.

2. All correspondence, letters, notes, memoranda, records, motions, pleadings and legal research justifying the work alleged by you and the attorney hours and amounts that you charged the Miccosukee Tribe for alleged legal work for the periods described below:

Your Bill No.	Month	Hours Billed	Amount Billed
1097	Apr-06	13.00 hrs	7,150.00
1109	Apr-06	23.70 hrs	14,338.50
1360	May-06	21.00 hrs	12,705.00
1351	May-06	39.00 hrs	21,450.00
1557	Jun-06	20.15 hrs	12,190.75
1548	Jun-06	68.40 hrs	37,620.00
1624	Jun-06	68.40 hrs	37,620.00
1756	Jul-06	19.90 hrs	12,039.50
1747	Jul-06	32.20 hrs	17,710.00
1971	Aug-06	30.90 hrs	18,694.50
1962	Aug-12	24.00 hrs	13,200.00
2192	Sep-06	27.70 hrs	15,235.00
2183	Sep-06	66.50 hrs	40,232.50
2174	Sep-06	10.20 hrs	5,610.00
2398	Oct-06	39.50 hrs	23,897.50
2407	Oct-06	22.70 hrs	12,485.00
2593	Nov-06	33.20 hrs	20,086.00
2774	Jan-07	86.90 hrs	52,574.50

3. Copies of your United States Passport, or any other Passport or Travel Document showing all entries and exits to and from the United States for the period beginning on January 1, 2006, through and including January 1, 2010.

4. All papers, documents, receipts, airplane tickets and reimbursements for any and all travels to the country of Panama for the period beginning on January 1, 2006, through and including January 1, 2010.

5. All papers, receipts, airplane tickets, signing sheets, manifest logs, reservations, reimbursements and/or applications for any and all private flights on Revolution Air or any other airline providing private flight services to Revolution Air for the period beginning on January 1, 2006, through and including January 1, 2010.

6. All papers, documents, receipts, airplane tickets and reimbursements for any and all travels to the country of Italy for the period beginning on January 1, 2006, through and including January 1, 2010.

7. All papers, documents, receipts, airplane tickets and reimbursements for any and all travels to the country of Luxemburg for the period beginning on January 1, 2006, through and including January 1, 2010.

8. All charges for meals, travels, accommodations, parking and/or any other expenses submitted for reimbursement to the Miccosukee Tribe for

the period beginning on January 1, 2006, through and including January 1, 2010.

9. All Contracts, Agreements for Representation, Engagement Agreements, and Retainer Agreements between you and your law firm and the Miccosukee Tribe for the years 2005 through and including January 1, 2010, during which time you represented the Miccosukee Tribe as an attorney.

10. All Notices of Conflict of Interest, Conflict of Interest Waivers and Disclosures of Conflicts of Interest from you and your law firm to the Miccosukee Tribe for the years 2005 through and including January 1, 2010, during which time you represented the Miccosukee Tribe as an attorney.

11. All Contracts, Agreements for Representation, Engagement Agreements and Retainer Agreements between you and your law firm with any individual member of the Miccosukee Tribe for the period of January 1, 2005 through and until the date of this Request to Produce.

12. Copies of all payments (front and back) of checks, money orders and receipts for payments received from any individual member of the Miccosukee Tribe for legal fees paid to you and your law firm for the period beginning on January 1, 2005, through and until the date of this Request to Produce.

13. Copies of all payments (front and back) of checks, money orders and receipts for payments received from the individual reflected on your invoices under your File Numbers 108.09, 108.10, 108.11 and 108.12 for legal services, which were paid to you and your law firm for the period beginning on January 1, 2005, through and until the date of this Request to Produce.

14. All charges for attorney's fees and expenses that you and your law firm billed to the Miccosukee Tribe reflected on your invoices under your File Numbers 108.09, 108.10, 108.11 and 108.12 for the period beginning on January 1, 2006, through and until the date of this Request to Produce.

15. Any Contracts, Agreements for Representation, Engagement Agreements and Retainer Agreements with the individual member of the Miccosukee Tribe that you represented and which is reflected on your invoices under your File Numbers 108.09, 108.10, 108.11 and 108.12 for the years January 1, 2006 through and until the date of this Request to Produce.

16. All Notices of Conflict of Interest, Conflict of Interest Waivers and Disclosures of Conflicts of Interest with the individual member of the Miccosukee Tribe that you represented and which is reflected on your invoices under your File Numbers 108.09, 108.10, 108.11 and 108.12 for the years January 1, 2006 through and until the date of this Request to Produce.

17. All papers, documents, receipts, airplane tickets and reimbursements for any and all travels to Las Vegas, Nevada for the period beginning on January 1, 2006, through and including January 1, 2010.

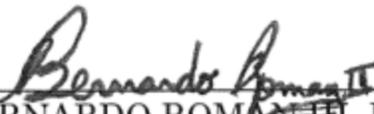
18. All receipts for any and all withdrawals of funds from ATM machines in Las Vegas, Nevada for the years 2006, 2007, 2008 and 2009 by you or anyone on your behalf or by your law firm or anyone on behalf of your law firm.

19. All credit card charges to any and all American Express credit cards in Las Vegas, Nevada for the years 2006, 2007, 2008 and 2009 incurred by you or your law firm.

20. All correspondence, letters, notes, memoranda, records, motions, pleadings and legal research justifying the 2,200.35 hours of attorney work alleged by you and your law firm in tax matters on behalf of the Miccosukee Tribe and for which you charged the Miccosukee Tribe the amount of \$1,174,865.00 as an attorney for the Miccosukee Tribe. Please refer to the letter dated January 4, 2012 attached herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been hand-delivered to the Miami-Dade County Courthouse, Attn: Clerk of Courts, located at 73 West Flagler Street, Miami, Florida 33130 and sent by regular mail to Guy Lewis, Esquire, located at Lewis Tein P.L., 3059 Grand Avenue, Suite 340, Coconut Grove, Florida 33133, this 10th day of April, 2012.


BERNARDO ROMAN III, ESQUIRE
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Tribal Attorney,
Miccosukee Tribe of Indians of Florida
P.O. Box 440021, Tamiami Station
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Telephone: (305) 894-5214
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*Attorney for Miccosukee Tribe of Indians
of Florida*



Miccosukee Tribe of Indians of Florida

Business Council Members

Colley Billie, Chairman

Jasper Nelson, Ass't. Chairman
Jerry L. Cypress, Treasurer

Andrew Bert Sr., Secretary
William M. Osceola, Lawmaker

January 4, 2012

Sent via email (lewis@lewistein.com)
and Certified Mail Return Receipt Requested

Guy A. Lewis, Esquire
Lewis Tein, PL
3059 Grand Avenue, Suite 340
Coconut Grove, Florida 33133

RE: Miccosukee Tribe vs. Internal Revenue Service

Dear Mr. Lewis:

A review of the invoices and legal work described therein that you submitted to the Miccosukee Tribe for legal work allegedly performed by your law firm during the years 2005 through and including 2010 for Internal Revenue Service ("IRS") matters shows a total of 2,200.35 hours of attorneys' work on this issue alone. These invoices also show that your law firm was paid \$1,174,865.00 for legal work exclusively involving IRS matters that are relevant to the current litigation between the Miccosukee Tribe and its members and the IRS.

Despite several requests dating back to 2010, your law firm has repeatedly refused, without a valid legal reason, to provide any information, case files, or records to the Miccosukee Tribe for work which the Miccosukee Tribe has already paid. This letter shall serve as a final request to return to the Miccosukee Legal Department, **within ten (10) business days from the date of this letter**, all records, case files, and documents related to your law firm's work in IRS matters for the Miccosukee Tribe and its members for the period of 2005 through and including 2010, and for which your law firm received \$1,174,865.00 in payments from the Miccosukee Tribe.

Your prompt attention to this matter is required.

Sincerely,


Bernardo Roman III
Tribal Attorney, Miccosukee Tribe

cc: Miccosukee Business Council