

Court Subpoena Duces Tecum

1. All policies, handbooks, training materials, guidelines for security guards and any other security personnel at [redacted] Church.
2. A list of all employees and descriptions of employees on duty at [redacted] Church on [redacted] 2022.
3. A copy of any handbook, rule book, agreement given to or governing the conduct of all members of [redacted] Church.
4. Any and all records of possession of [redacted] Church in about or in relation to defendant.
5. Copies of all audits, corrective action plans, incident reports, notes created for and or in reference to the alleged homicide of deceased or any disturbance occurring on or about [redacted] 2022 and notices of any existent and or ongoing investigations in that incident or evaluations of what happened and determinations either final or preliminary, of whether any of [redacted] Church's standards or rules were violated.
6. Copies of all civil and criminal lawsuits filed against [redacted] Church and or its employees or agents filed by [redacted] Church against another individual or entity concerning violence, physical assault, trespass, and or vandalism.
7. Hours at which [redacted] Church and its property is open to the public and its members.
8. All policies pertaining to trespassing on Church Grounds.
9. All standard operating procedures, guidelines, rules of engagement, and use of force for security guards and or personnel when confronting trespassers, vandalism, threats of violence, and or vagrancy.
10. Any complaints made against [redacted] Church security guards or security personnel.
11. All employment records pertaining to security director to include his entire human resources file, shadow file, trainings and certifications completed, job and duties description, discipline records, complaints filed about him or by him, security certifications.
12. All employment records pertaining to deceased to include his entire human resources file, shadow file, trainings and certifications completed, job and duties description, discipline records, complaints filed about him or by him, security certifications.
13. Any records pertaining to certifications, trainings, licenses, or training pertaining to firearms to be used by or supervised by deceased.