

For the 12.22.09 meeting with Judge and Eric  
Case 1:08-cv-03367-ARR-RER Document 201-2 \*SEALED\* Filed 04/08/11 Page 1 of 1 Page 1 of 1


**From:** AnnaBoveEmbroidery.com <support@annaboveembroidery.com>

**To:** Boris Kogan <bk@boriskogan.com>

**Cc:** db@boriskogan.com

**Date:** Sunday, December 20, 2009 09:56 pm

**Subject:** For the 12.22.09 meeting with Judge and Eric

**Attachments:**  Meeting-Boris-Judge-122209.doc (38KB)

12.20.09,  
Hello Boris!

Here are the promised considerations regarding inquiries to Mikhlyns  
(attach a document).

With respect,  
Alex, Anna, Polina

=====  
Attorney-Client Privilege.

This email, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

<http://mail.boriskogan.com/edgedesk/cgi-bin/viewmail.exe?id=01a61213fc01ee25e648d59e83ccef01d610...> 3/29/2011

### ATTORNEY-CLIENT PRIVILEGE

**Symbols:**

- A) Supplies include: thread for embroidery machines, stabilizers, thread nets, bobbins and other supplies that are used for machine embroidery.
- B) The first Orders also include orders and receptions of Supplies beginning from Jan 1 2004, including orders and receptions of Supplies by the company Raza Designs.
1. All documentation (including all the financial one), related to [REDACTED] Supplies, beginning from the very First Orders in 2004, up to the current moment (December 2009).
  1. All documentation (including all the financial one), related to [REDACTED] Supplies, beginning from the very First Orders in 2004, up to the current moment (December 2009).
  2. All documentation (including all the financial one), related to release from customs, and storing Supplies in places of cargo receptions, beginning from the very First Orders in 2004, up to the current moment (December 2009).
  3. All documentation (including all the financial one), related to receptions (with specification of reception dates) and with delivery of cargoes to the places of long-term storage and sorting Supplies, beginning from the very First Orders in 2004, up to the current moment (December 2009).
  4. A list of all Supplies storage places, with specification of storage periods.
  5. All information about the opening and use of all merchant accounts, and also of PayPal merchant accounts, for accepting credit cards online and by phone, for the sites [www.annabovcollection.com](http://www.annabovcollection.com) and [www.abc-machine-embroidery.com](http://www.abc-machine-embroidery.com). Including all transactions regarding payment for purchased merchandize and services, and also all notifications and transactions of transfers to bank accounts.
  5. All information regarding the opening and use of all 2CO accounts, for accepting credit cards online. Including all transactions regarding payment for purchased merchandize and services, and also all notifications and transactions of transfers to bank accounts.
  6. Data and all information (except of the already received one) of PayPal accounts, also related to ABC ALL Consulting, Inc, and receiving payments for ABC ALL Consulting, Inc..
  8. All W2 forms of Plaintiffs, as well as their personal tax reports, since 2004 through the time being, since Plaintiffs stated that they have deposited client checks to their personal accounts.
  9. All information about all business bank accounts of the companies ABC All Consulting, Inc and Anna Bove Collections, Inc (Boris, we've got only from one account in Gotham bank, but perhaps there are others?). In information provided to us there are some missing pages, and May 2005 is missing. Also copies of client checks are missing (personal and others), and there are also missing summary deposit slips, with lists of amounts deposited by clients and other parties, to the company account.
  10. All information about all of the paid clients' orders. And especially about all orders paid by clients' checks, including payments by personal checks, bank checks and money orders to the personal names of Mikhljns. What is their system for accounting such payments? Or, let them

ATTORNEY-CLIENT PRIVILEGE

### ATTORNEY-CLIENT PRIVILEGE

say that such accounting wasn't done.

11. All information about any money transfers from any business accounts of company ABC All Consulting, Inc and Anna Bove Collections, Inc, since this is exactly how were concealed the names where the money went. (Boris, to do a money transfer, they had either go to the bank and file application, or fill an application online). E.g. detailed information about money transfers is needed.

12. All information about all credit cards of the company ABC All Consulting, Inc and Anna Bove Collections, Inc. Within the information provided to us, many pages are missing. (Boris, here there's also needed a detailed information about money transfers, and moneys that they've been taking for themselves via checks, from credit cards and/or Home equity line of credit in "NationalCity", Account #4489 6183 2069 9284.) To all of these accounts, including also the "NationalCity", money from the business were transferred.

13. All information about all Plaintiffs' personal bank accounts and credit cards. Here the information about any money transfers is also important, since it's exactly how they've been concealing the names where the money were leaving. Within the information provided to us, regarding their personal bank account, many pages are missing. To all of these accounts, moneys were transferred from the business.

14. Detailed information is needed regarding the purchase of all 3 cars.

15. Detailed information is needed regarding payments for all 3 cars.

16. Detailed information is needed regarding Downpayment for the house, in spring-summer 2006. From what accounts, by what amounts did they pay?

17. Boris, just in case, I'd like to remind that they have inquired for Fusemail. If these are old accounts (old abc.all and abcembro), which they have grasped, then I'd like to say that these email accounts are still on Polln's name, and it would be good for us to get them back, and receive all information about clients.

If they inquired for ana.bove, which was opened at the end of March 2008, then since April 1 2008 it contains the correspondence with you. It can't be given. The same is correct about [ana.bove@yahoo.com](mailto:ana.bove@yahoo.com) account, as well as all other email accounts of user "ana.bove". They include correspondence with you, trade secrets, customer emails, business passwords and other sensitive, privileged information.

~~old accounts: abc.all@fusemail.com; abcembro@fusemail.com;  
annb997@fusemail.com; polln@fusemail.com; ladvdin@fusemail.com; New  
account: ana.bove@fusemail.com; annaboveembroidery@fusemail.com~~

18. Boris, I'd also like to remind that they're trying to request a Subpoena for TradeIndicator, Inc, to which our Anna Bove Company LLC has been paying rent since 2008. If this is only regarding rent payments themselves, then this is up to you, but if it's something more, then let's subpoena the Wells Fargos Bank, to whom they've been paying rent, for all of it's activities??? This is an absurd, isn't it? TradeIndicator, Inc isn't a participant in this lawsuit, it just was paid for rent. I hope that I understand this correctly, and you will get this

ATTORNEY-CLIENT PRIVILEGE

**ATTORNEY-CLIENT PRIVILEGE**

We've given the following documents:

1. AB Israel "Leumi" Bank Statements
2. AB and PD Spain Bank Statements (Current and Savings Accounts)
3. AB Tax reports
4. AB and PD business and personal PayPal accounts
5. PD Israel "Bank Hapoalim" Statements - need to pay, costs a lot, no money for this.
6. For Anna Bove Company, LLC and Anna Bove Embroidery Supplies, Inc, we've provided the following documents:
  - 6-1. Registrational documents.
  - 6-2. Yearly reports for 2008.
  - 6-3. Documents for the purchases of supplies, and for their receptions.
  - 6-4. Documents regarding UPS and USPS.
  - 6-5. Documents regarding the purchase of equipment for the offices, and for the warehouse.

**REDACTED**

We didn't give: Agreement between AB and AS. Agreement between AB, AS and the "Investor". QuickBook, or whatever takes their place. Orders of clients = trade secret. Client checks = trade secret.

**ATTORNEY-CLIENT PRIVILEGE**