

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

MICHAEL SHILLAN,
Petitioner,

CASE NO.: 2025-DR-6662-SB

DIVISION: FX

vs.

FRANCINE CHANG,
Respondent/Third-Party Plaintiff,

and

LIBRA CAPITAL ADVISORS, INC. and
WOW LOTTERY VENTURES, LLC,
Third-Party Defendants.

**NOTICE OF INTENT TO ISSUE SUBPOENA DUCES TECUM WITHOUT
DEPOSITION**

TO: Michael Shillan c/o Andrew S. Lieberman, Esquire

YOU ARE NOTIFIED that after 10 days from the date of service of this notice, if service is by delivery, or 15 days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned will issue the attached subpoena directed to Harry M. Samuels or records custodian, Samuels Accounting & Financial Services, Inc., 2901 Stirling Road, Suite 307, Ft Lauderdale, FL 33312, who is not a party, to produce the items listed at the time and place specified in the subpoena.

CERTIFICATE OF SERVICE

I CERTIFY that on December 22, 2025, a copy of the foregoing was sent through the e-filing portal on Andrew S. Lieberman, Esquire, WiseLieberman, PLLC, 1800 NW Corporate Blvd., Suite 310, Boca Raton, Florida 33431; andrew@wiselieberman.com.

DEBI GHEORGE-ALTEN, P.A.
daltenLaw@att.net
PO Box 771105
Coral Springs, FL 33077-1105
954/575-9229 (Telephone)

/s/ Debi Gheorge-Alten
Debi Gheorge-Alten, Esq.
Florida Bar No.: 123455

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SUBPOENA DUCES TECUM WITHOUT DEPOSITION

THE STATE OF FLORIDA:

TO: Harry M. Samuels or records custodian,
Samuels Accounting & Financial Services, Inc.
2901 Stirling Road, Suite 307
Ft Lauderdale, FL 33312

YOU ARE COMMANDED to appear at: **DEBI GHEORGE-ALTEN, P.A.**, 7351 Wiles Rd.
Suite 101, in Coral Springs, Florida 33067, on February 2, 2026, at 10:00 a.m. and to
have with you at that time and place the following:

See Attached Exhibit "A"

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to: (1) appear as specified; or (2) furnish the records instead of appearing as provided above; or (3) object to this subpoena, you may be in contempt of court. You are

subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you must respond to this subpoena as directed.

“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact William Hutchings Jr., MPA, PHR, the Americans with Disabilities Act Coordinator, Palm Beach County Courthouse, 205 North Dixie Highway West Palm Beach, Florida 33401; telephone number (561) 355-4380 at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con William Hutchings Jr., MPA, PHR, 205 N. Dixie Highway, West Palm Beach, Florida 33401; teléfono número (561) 355 4380, por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacitación del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedè sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte William Hutchings Jr., MPA, PHR, k donatè pwogram Lwa pou ameriken ki Enfim yo nan Tribinal Konte Palm Beach la ki nan 205 North Dixie Highway, West Palm Beach, Florida 33401; telef n li se (561) 355-4380 nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”

CERTIFICATE OF SERVICE

I CERTIFY that on January 2, 2026, a copy of the foregoing was sent through the e-filing portal on Andrew S. Lieberman, Esquire, WiseLieberman, PLLC, 1800 NW Corporate Blvd., Suite 310, Boca Raton, Florida 33431; andrew@wiselieberman.com.

DEBI GHEORGE-ALTEN, P.A.
PO Box 771105
Coral Springs, FL 33077
Phone: 954-575-9229

By: /s/Debi Gheorge-Altén
Debi Gheorge-Altén, Esq.,
Fla Bar No. 123455
Email: daltenlaw@att.net

EXHIBIT A

1. Audited and unaudited Financial Statements for WOW Lottery Ventures, LLC (“WOW”), including, but not limited to:
 - a) Profit & Loss statements for year-end 2021, year-end 2022, year-end 2023, year-end 2024, year-end 2025, quarterly or monthly report for January 2025 through present, and any year-to-date statements for 2025.
 - b) General Ledgers from year-end 2021, year-end 2022, year-end 2023, year-end 2024, quarterly or monthly report for January 2025 through present, and any year-to-date reports for 2025.
 - c) Balance Sheet on 12/31/2021, 12/31/2022, 12/31/2023, 12/31/2024, and 11/30/2025.
2. Audited and unaudited Financial Statements for Libra Capital Advisors, Inc. (“LCA”), including but not limited to:
 - a) Profit & Loss statements for year-end 2023, year-end 2024, year-end 2025, and year-to-date as of 11/30/2025.
 - b) General Ledgers from year-end 2024, year-end 2025, and year-to-date reports as of 11/30/2025.
 - c) Balance Sheet on 12/31/2024, 11/30/2025, and 12/31/2025.
3. Business Tax Returns including K-1’s for WOW for Tax Years 2021, 2022, 2023, and 2024.
4. Business Tax Returns including K-1’s for LCA for Tax Year 2024.
5. Any and all 1099’s for WOW for Tax Years 2021, 2022, 2023, and 2024.
6. Any and all 1099’s for LCA for Tax Year 2024.
7. Any and all Invoices issued or received by WOW from January 1, 2021, to the present.
8. Any and all Invoices issued or received by LCA from January 1, 2024, to the present.
9. Any and all check registers or payment logs for WOW from January 1, 2021, to the present.
10. Any and all check registers or payment logs for LCA from January 1, 2024, to the present.

11. Any and all business filings in your possession where you act or acted as the registered agent for entities in which Michael Shillan holds or held a direct or indirect interest.
12. The IRS Form 2553 (Election by a Small Business Corporation) filing made by WOW in your possession.
13. Any and all Electing Small Business Trust (“ESBT”) documents for any member or any person holding membership interests in WOW in your possession.
14. Any and all Non-Disclosure Agreements (“NDAs”) related to Michael Shillan or WOW in your possession, including any draft or unsigned versions.
15. Any and all Secretary of State filings including annual report filings in any state in which for WOW is registered or authorized to do business for calendar years 2021, 2022, 2023, 2024, and 2025 in your possession.
16. Any and all Option Contract Agreements involving WOW or Michael Shillan, prepared by you or anyone else, including any draft, unsigned, or proposed versions thereof.
17. Any and all Membership Unit Purchase Agreements involving WOW or Michael Shillan, prepared by you or anyone else, including any draft, unsigned, or proposed versions thereof.
18. Any and all Joinder Agreements involving WOW or Michael Shillan, prepared by you or anyone else, including any draft, unsigned, or proposed versions thereof.
19. Proof of payment, compensation, or consideration for any WOW membership units acquired by you, an immediate family member, or any entity in which you or an immediate family member holds an economic interest.