



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
Apex Clearing Corporation.
c/o Registered Agent
National Registered Agents, Inc.
28 Liberty St.
New York, New York, 10005

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in the false, deceptive, or misleading acts or practices related to restrictions imposed on the trading of securities.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to be "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. “**Document**” means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. “**Entity**” means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. “**Identify**” means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.

- b. Regarding a Person other than an individual, to identify:
 - i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
 5. **“Person”** means any individual person or entity.
 6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
 7. **“You”** and **“Your”** shall mean Apex Clearing Corporation and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Apex Clearing Corporation.
 8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
 9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
2. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
3. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or other company that clears security transactions through you regarding any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 1, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Citadel LLC
131 South Dearborn Street,
Chicago, IL 60603

Via CMRRR

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in the false, deceptive, or misleading acts or practices related to restrictions imposed on the trading of securities.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

Jennifer Jackson
Division Chief
Consumer Protection Division

/s/ Steven Robinson
Steven Robinson
Assistant Attorney General
T: (210) 270-1110
Email: Steven.Robinson@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. “**Document**” means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. “**Entity**” means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. “**Identify**” means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.

- b. Regarding a Person other than an individual, to identify:
 - i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
 5. **“Person”** means any individual person or entity.
 6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
 7. **“You”** and **“Your”** shall mean Citadel LLC and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Citadel LLC.
 8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
 9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all communications you have had, between January 11, 2021, and the present, with any directors, managers, employees, or agents of Robinhood Markets, Inc., Robinhood Financial, LLC, or Robinhood Securities, LLC regarding any of the companies or stock symbols found in Exhibit D.
2. Produce a copy of all communications you have had, between January 11, 2021, and the present, with any directors, managers, employees, or agents of any clearing firm or third party investment management firm regarding actions that could be taken to limit, prevent, or restrict the buying or selling of any securities for any of the companies or stock symbols found in Exhibit D.
3. Produce a copy of all internal communications you have had, between January 11, 2021, and the present, regarding actions you could take to limit or reduce your exposure related to your holdings or obligations related to securities of any of the companies or stock symbols found in Exhibit D.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail and Electronic Mail

Discord, Inc.

444 De Haro St., Ste 200

San Francisco, CA 94107

lawenforcement@discordapp.com

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code ("DTPA"), you are hereby directed to produce the items listed in Exhibit "C" attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit "C" to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division ("Division"). This documentary material shall be produced by February 26, 2021, ("return date") for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Discord's representations and practices related to its content moderation policies.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

Jennifer Jackson
Division Chief
Consumer Protection Division

/s/ Steven Robinson
Steven Robinson
Assistant Attorney General
Email: Steven.Robinson@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. “**Content**” means any and all information or media, including but not limited to text, picture files, video files, or audio files.
2. “**Content moderation**” means any action taken by You, including but limited to policies, human review processes, algorithms and machine learning, to limit, control or prevent the display of content on your platform, or to limit, control or prevent access to content on your platform.
3. “**Document**” means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
4. “**Entity**” means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
5. “**Identify**” means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;

- ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:
 - i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
- 6. **“Including”** means including, but not limited to.
- 7. **“Person”** means any individual person or entity.
- 8. **“Platform”** means any website, server, or resource managed or controlled by You on which you permit third-parties to post content or access content.
- 9. **“Post”** means to upload, copy, link or otherwise make available content.
- 10. **“Relate,” “related,” and “relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
- 11. **“User”** means a person who accesses or posts content on the platform, including but not limited to persons who post or access advertising content.
- 12. **“You” and “Your”** shall mean Discord, Inc. and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Discord, Inc.
- 13. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.

14. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2017, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other terms to which users must agree in order to post or access content on your platform, including but not limited to all revised documents relating to terms of use, terms of service, or other terms to which users must agree during the time from January 1, 2020, to the present. For each version of terms produced in response to this request, indicate the time frame during which it was in use.
2. Produce a copy of all your policies and procedures related to content moderation on your platform, including any policies or procedures that limit the reach or visibility of content intended for public viewers, including but not limited to all revised policies and procedures related to content moderation on the platform during the time from January 1, 2020, to the present. For each version of terms produced in response to this request, indicate the time frame during which it was in use.
3. Produce a copy of all public statements you have made regarding your policies and/or procedures related to content moderation on your platform, including but not limited to statements made or caused to be made to the media, to advertisers, to legislators, and on your website and/or blog during the time from January 1, 2020, to the present.
4. Produce a copy of all communications you have had, between January 1, 2020, and the present, with any owner, operator, or moderator of the r/WallStreetBets server, including any communications regarding your decision to limit, control, or prevent access to the r/WallStreetBets server.
5. Produce all documents, whether internal or to outside parties, regarding any content moderation policy or the application of any such policy to any discord server used by r/WallStreetBets, including, but not limited to, any prior warnings, moderation actions, or actions to limit access to or communication on that server.
6. Produce a copy of all communications, internal and to third parties, you have had, between January 1, 2021, and the present, regarding the r/WallStreetBets server.
7. Produce documents identifying all servers other than the r/WallStreetBets server against which you have taken action since January 1, 2020, to limit, control, or prevent access to such server on your platform. For each such server, produce documents identifying all policy violations or other reasons supporting your decision to limit, control, or prevent access to the server.



**OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
E*Trade Securities, LLC.
c/o Registered Agent
Corporation Service Company dba CSC - Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701-3218

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in E*Trade Securities, LLC's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

_____/s/Steven Robinson_____
Steven Robinson
Assistant Attorney General
112 E. Pecan St., Suite 735
San Antonio, TX 78205
Steven.Robinson@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You”** and **“Your”** shall mean E*Trade Securities, LLC and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by E*Trade Securities, LLC.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Interactive Brokers, LLC
c/o Registered Agent
IBG, LLC
One Pickwick Plaza
Greenwich, CT 06830

Via CMRRR:

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Interactive Brokers, LLC's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

/s/ Steven Robinson

Steven Robinson

Assistant Attorney General

T: (210) 270-1110

Email: Steven.Robinson@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You”** and **“Your”** shall mean Interactive Brokers, LLC, and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Interactive Brokers, LLC.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



**OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
M1 Holdings Inc.
c/o Registered Agent
Incorporating Services, Ltd.
3500 S Dupont Hwy.
Dover, DE 19901

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in M1 Holdings, Inc's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You”** and **“Your”** shall mean M1 Holdings Inc., M1 Finance, LLC and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by M1 Holdings Inc.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



**OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
Public Holdings, Inc.
c/o Registered Agent
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Public Holdings, Inc.’s representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. “**Document**” means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. “**Entity**” means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. “**Identify**” means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.

- b. Regarding a Person other than an individual, to identify:
 - i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
 5. **“Person”** means any individual person or entity.
 6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
 7. **“You”** and **“Your”** shall mean Public Holdings, Inc. and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Public Holdings, Inc.
 8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
 9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



**OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
Robinhood Financial, LLC
c/o Registered Agent
Incorporating Services, Ltd.
3500 S Dupont Hwy.
Dover, DE 19901

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Robinhood Financial LLC's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You”** and **“Your”** shall mean Robinhood Financial, LLC all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Robinhood Financial, LLC.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
Robinhood Markets, Inc.
c/o Registered Agent
Incorporating Services, Ltd.
3500 S Dupont Hwy.
Dover, DE 19901

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code ("DTPA"), you are hereby directed to produce the items listed in Exhibit "C" attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit "C" to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division ("Division"). This documentary material shall be produced by February 26, 2021, ("return date") for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Robinhood Markets, Inc's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You”** and **“Your”** shall mean Robinhood Markets, Inc. and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Robinhood Markets, Inc.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
Robinhood Securities, LLC
c/o Registered Agent
Incorporating Services, Ltd.
3500 S Dupont Hwy.
Dover, DE 19901

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Robinhood Securities, LLC's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,” and “relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You” and “Your”** shall mean Robinhood Securities, LLC all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Robinhood Securities, LLC.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
Charles Schwab & CO., Inc.
c/o Registered Agent
CT Corporation Systems
818 West Seventh St., Suite 930
Los Angeles, CA 90017

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548. This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in Charles Schwab & CO., Inc's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

/s/ Steven Robinson
Steven Robinson
Assistant Attorney General
112 E. Pecan St., Suite 735
San Antonio, TX 78205
Steven.Robinson@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You”** and **“Your”** shall mean Charles Schwab & CO., Inc, TD Ameritrade and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by Charles Schwab & CO., Inc.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

CIVIL INVESTIGATIVE DEMAND

**TO: TD Bank, NA
3000 Atrium Way, Suite 430
Mail Code NJ5-336-403
Mt. Laurel, Nj 08054**

Via Email: gsi.subpoenas@td.com

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in **TD Bank, NA** representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

Jennifer Jackson
Division Chief
Consumer Protection Division

/s/ Steven Robinson

Steven Robinson
Assistant Attorney General
T: (210) 270-1110
Email: Steven.Robinson@oag.texas.gov

Agent:
Rozanne Lopez, Investigator
T: (210) 270-1118
Email: rozanne.lopez@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. “**Document**” means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. “**Entity**” means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. “**Identify**” means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.

- b. Regarding a Person other than an individual, to identify:
 - i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
 5. **“Person”** means any individual person or entity.
 6. **“Relate,” “related,”** and **“relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
 7. **“You”** and **“Your”** shall mean TD Bank, NA and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by TD Bank, NA.
 8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
 9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG



**OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION**

CIVIL INVESTIGATIVE DEMAND

TO: Via Certified Mail
WeBull Financial LLC
c/o Registered Agent
Business Filings Incorporated
108 West 13th St.
Wilmington, DE 19801

Pursuant to this office's specific authority under section 17.61 of the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41-.63, Texas Business and Commerce Code (“DTPA”), you are hereby directed to produce the items listed in Exhibit “C” attached hereto. Such production is governed by the instructions and definitions on this page and subsequent pages.

You are to make available the documentary material described in Exhibit “C” to the undersigned Assistant Attorney General, or other authorized agent(s) identified by the Consumer Protection Division (“Division”). This documentary material shall be produced by February 26, 2021, (“return date”) for inspection and copying. You may deliver true copies of the requested documents by the return date in lieu of producing the originals for inspection and copying. Copies of the requested materials may be sent to the undersigned agent(s) below at the Office of the Attorney General, Consumer Protection Division Chief, P.O. Box 12548 (MC-076), Austin, TX 78711-2548.

This Civil Investigative Demand is relevant to the subject matter of an investigation of possible violations of sections 17.46(a) and (b) of the DTPA in WeBull Financial LLC's representations and practices regarding the cessation of trading services.

TAKE NOTICE THAT pursuant to § 17.62, TEX. BUS. & COM. CODE, any person who attempts to avoid, evade, or prevent compliance, in whole or in part, with this directive by removing, concealing, withholding, destroying, mutilating, altering, or by any other means falsifying any documentary material may be guilty of a misdemeanor and on conviction is punishable by a fine of not more than \$5,000.00 or by confinement in the county jail for not more than one year, or both.

ISSUED THIS 29th day of January, 2021.

A handwritten signature in blue ink, appearing to read "Rick Berlin", written over a horizontal line.

Rick Berlin
Assistant Attorney General
808 Travis St., Suite 1520
Houston, TX 77002
Rick.Berlin@oag.texas.gov

EXHIBIT A—Definitions

Definitions

1. **“Document”** means the original and all non-identical copies (whether different from the original because of notes, underlining, attachments, or otherwise) of all computer files, and all written, printed, graphic or recorded material of every kind, regardless of authorship. It includes communications in words, symbols, pictures, photographs, sounds, films, and tapes, as well as electronically stored information, computer files, together with all codes and/or programming instructions and other materials necessary to understand and use such systems. The term “computer files” includes information stored in or accessible through computers or other information retrieval systems and includes but is not limited to drafts of documents, metadata, embedded, hidden and other bibliographic or historical data describing or relating to documents created, revised, or distributed on computer systems, as well as spreadsheets and their underlying cell formulae and other codes. Thus, you should produce documents that exist in machine-readable form, including documents stored in personal computers, portable computers, workstations, minicomputers, phones, pagers, personal data/digital assistants, archival voice storage systems, group and collaborative tools, electronic messaging devices, mainframes, servers, backup disks and tapes, archive disks and tapes, and other forms of offline storage, whether on or off your premises. This definition covers electronic mail messages (“e-mail”), text messages, voice mail, and all other documents in the possession of you and/or your directors, officers, managers, or employees, whether located at their home or office, whether on work or personal devices. Notice: Unless otherwise specified, the term "document" excludes bills of lading, invoices in non-electronic form, customs declarations, purchase orders, and other similar documents of a purely transactional nature, and also excludes architectural plans and engineering blueprints.
2. **“Entity”** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
3. **“Identify”** means
 - a. Regarding an individual, to identify that individual’s:
 - i. name;
 - ii. title;
 - iii. present business affiliation;
 - iv. current or last known telephone numbers at business and home; and
 - v. current or last known business and home addresses.
 - b. Regarding a Person other than an individual, to identify:

- i. its full name;
 - ii. the nature of its organization;
 - iii. the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - iv. its principal line of business or activity.
 - c. Regarding any other tangible thing, to identify:
 - i. what it is, giving a reasonably detailed description thereof;
 - ii. when, where, and how it was made, if applicable;
 - iii. who made it, if applicable; and
 - iv. its current custodian or the person that had last known possession, custody, or control thereof
4. **“Including”** means including, but not limited to.
5. **“Person”** means any individual person or entity.
6. **“Relate,” “related,” and “relating”** mean being in any way legally, logically, or factually connected with the subject matter of the request at issue.
7. **“You” and “Your”** shall mean WeBull Financial LLC and all of its parent companies, subsidiary companies, sister companies, and other entities owned, controlled, or directed by WeBull Financial LLC.
8. The words **“and”** and **“or”** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
9. Unless the context otherwise clearly indicates, words used in the singular include the plural, the plural includes the singular, and the neuter gender includes the masculine and the feminine.

EXHIBIT B—Instructions

1. **Read These Instruction/Definitions.** Read these instructions and definitions carefully.
2. **Meet and Confer:** Please contact the undersigned, as soon as possible to schedule a meeting (telephonic or in person) in order to discuss compliance and to address and attempt to resolve all issues, including issues related to protected status, the form and manner in which claims of protected status will be asserted, the submission of Electronic Stored Information, and any proposed modifications limiting the scope of the required search or response for any request.
3. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this Civil Investigative Demand must be preserved. *Any ongoing, scheduled or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.
4. **Relevant Dates.** Unless otherwise noted, the requests in this Civil Investigative Demand require production of documents for each year from January 1, 2020, to the date you received this Civil Investigative Demand, herein called “the relevant time period.”
5. **Custody & Control.** In responding to this Civil Investigative Demand, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control, including those within the possession of persons reasonably available to you or under your direction or control.
6. **Identification of Documents not in Custody or Control.** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. The name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and

- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

7. **Privileged Documents.** If any responsive document is withheld, in whole or in part, under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document or partial document that you have withheld:
 - a. the document's control numbers;
 - b. all authors of the document;
 - c. all addressees of the document;
 - d. all recipients of the document or of any copies of the document, to the extent not included among the document's addressees;
 - e. the date of the document;
 - f. a description of the subject matter of the document sufficient to determine the applicability of the privilege;
 - g. the nature or type of the privilege that is being asserted for the document (e.g., "attorney-client privilege");
 - h. the specification(s) of the Demand to which the document is responsive;
 - i. the document control number(s) of any attachments to the document, regardless of whether any privilege is being asserted for such attachment(s); and
 - j. whether the document has been produced in redacted form, and if so, the range of the control numbers for the document.
8. **Trade Secrets.** It is your responsibility to clearly designate which, if any, of the requested documents contain trade secrets, in accordance with Section 17.61(f) of the Texas Business & Commerce Code.
9. **Production of Electronic Stored Information.** Before you prepare documents or information for production in electronic form in order to comply with this Civil Investigative Demand (for example, before you attempt to process electronically stored information or image hard copy documents), you must consult with the undersigned and reach agreement regarding the format and method of production. Unless otherwise agreed to in writing by the designated OAG representative, electronically stored information shall be produced in electronic form.

10. **Non-identical Copies to be Produced.** Identical copies of responsive documents need not be produced. However, any copy of a document that differs in any manner, including but not limited to the presence of handwritten notations, different senders or recipients, etc. shall be produced.
11. **No Redaction.** All materials or documents produced in response to this Civil Investigative Demand shall be produced, except as deemed privileged, in complete unabridged, unedited and un-redacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document.
12. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which Request, and each sub-part of a Request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.
13. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.
14. In any situation in which it is not clear in which capacity you are responding, you are to designate all relevant capacities.
15. If responses to any request are different for more than one group or category of persons, please respond separately for each relevant category or group of persons and clearly identify to whom each response is applicable. By way of example only, if your content moderation policies and practices are different for advertising users as compared to non-advertising users, respond to each request separately for advertising users and non-advertising users.
16. All document requests are continuing in nature so as to require supplementary documents if you obtain further responsive documents.

EXHIBIT C

Requests

1. Produce a copy of all terms of use, terms of service, or other agreements to which users must agree in order to open an account and/or buy or sell securities through you.
2. Produce documents detailing any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D. Include but do not limit your response to documents detailing all of the reasons you took such action.
3. Produce a copy of all public statements you made related to any action you took between January 1, 2021, and the present to limit, prevent, or restrict the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
4. Produce a copy of all communications you have had, between January 1, 2021, and the present, with any directors, managers, employees, or agents of any investment management firm or clearing firm regarding any of the companies or stock symbols found in Exhibit D.
5. Produce a copy of all other communications, internal or to third parties, you have had, between January 1, 2021, and the present, regarding the possibility of limiting, preventing, or restricting the buying or selling of securities for any of the companies or stock symbols found in Exhibit D.
6. Other than documents produced in response to Request No. 2, produce documents identifying any action you took between January 1, 2020, and the present, to limit, prevent, or restrict the buying or selling of securities. Include but do not limit your response to documents identifying the reasons you took such action.

EXHIBIT D

Company	Stock Symbol
American Airlines Group, Inc.	AAL
AMC Entertainment Holdings, Inc.	AMC
BlackBerry Limited	BB
Bed, Bath & Beyond Inc.	BBBY
Castor Maritime Inc.	CTRM
Express Inc.	EXPR
Gamestop Corporation	GME
Koss Corp	KOSS
Naked Brand Group Ltd	NAKD
Nokia Corporation	NOK
Sundial Growers Inc.	SNDL
Tootsie Roll Industries, Inc.	TR
Trivago N.V.	TRVG