

**BEFORE THE CODE COMPLIANCE SPECIAL MAGISTRATE  
OF THE CITY OF KEY WEST, FLORIDA**

**CITY OF KEY WEST,  
PETITIONER,  
v.**

**CASE NUMBER: CES-13-57**

**KWSC, INC  
DBA ADULT ENTERTAINMENT CLUB  
c/o ALBERT L. KELLEY, P.A., REGISTERED AGENT  
926 TRUMAN AVENUE  
KEY WEST, FL 33040  
and  
ANTHONY B. HUGGINS  
of 1008 WHITEHEAD STREET  
KEY WEST, FL, 33040  
RESPONDENT (S).**

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**APPLICATION FOR SUBPOENA DUCES TECUM**

Petitioner, the City of Key West, hereby requests issuance of a Subpoena Duces Tecum, in the form attached, and as grounds therefore states:

1. This case is pending before the Code Compliance Special Magistrate, pursuant to Chapter 162, Fla. Stat.
2. The Petitioner, City of Key West, pursuant to Section 162.08 (3), Fla. Stat, has cause to believe that certain records in the possession of the party to whom the subpoena is directed, as set forth in the proposed subpoena duces tecum attached hereto, are relevant to and probative of issues raised in this enforcement action.

WHEREFORE, Petitioner requests that the Special Magistrate authorize and grant the Subpoena requested herein, pursuant to the above-cited authority.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. Mail to Albert L. Kelley, Esq Attorney for Respondent(s) KWSC, Inc., this 16<sup>th</sup> day of January, 2013.

Respectfully submitted,

  
\_\_\_\_\_  
Jim Young  
Code Enforcement Manager

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KEY WEST, FL 33040

and

ANTHONY B. HUGGINS  
of 1008 WHITEHEAD STREET  
KEY WEST, FL, 33040

**RESPONDENT (S).**

**SUBPOENA DUCES TECUM**

THE CITY OF KEY WEST:

To: **Custodian of Records for  
KWSC, INC.  
DBA Adult Entertainment Club  
c/o Albert L. Kelley, P.A. Registered Agent  
926 Truman Avenue  
Key West, FL 33040**

YOU ARE COMMANDED to appear before Special Magistrate J.

Jefferson Overby, at Key West Old City Hall, 510 Greene Street, Key West, FL, on June 26, 2013 at 1:30 p.m., to testify in this action.

All documents in your possession concerning, referring to or relating to the employer/employee relationship for the business known as KWSC, Inc. DBA Adult Entertainment Club located at 1221 Duval Street, Key West, FL 33040 are to be delivered to Deborah Millett-Fowley Code Compliance Legal Analyst or designee by June 25, 2013. Such documents shall include:

1. All payroll records including W2's, W4's or 1099-MISC from January 2010 for Anthony B. Huggins to present.
2. Any and all documents or written contracts for Anthony B Huggins from January 2010 to present that is not privileged information.
3. Any other document(s) or records showing the existence of the employer/employee relationship for Anthony B Huggins.
4. Any and all documents provided to employees and contract employees for work schedules, employment policies about advertising or off premises canvassing policies and what they are allowed to do on and off premises in regards to attracting business, standards and training from January 2010 to present.
5. Receipts for advertising including payment receipts for the Adult Entertainment Club advertising cards from January 2010 to present.
6. All names and addresses of all employees and contract employees from January 2010 to present and whether or not they are still working at this company.

You are subpoenaed by the Special Magistrate, and unless excused from this subpoena by the Special Magistrate, you shall respond to this subpoena as directed.

DATED on this 23rd day of May, 2013

  
\_\_\_\_\_  
J. JEFFERSON OVERBY  
Special Magistrate  
City of Key West  
Code Compliance

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926 TRUMAN AVENUE  
KEY WEST, FL 33040  
and  
ANTHONY B. HUGGINS  
of 1008 WHITEHEAD STREET  
KEY WEST, FL, 33040  
RESPONDENT (S).**

**SUBPOENA DUCES TECUM FOR TRIAL**

**THE CITY OF KEY WEST:**

**To: Custodian of Records for  
KWSC, INC.  
DBA Adult Entertainment Club  
c/o Albert L. Kelley, P.A. Registered Agent  
926 Truman Avenue  
Key West, FL 33040**

**YOU ARE COMMANDED to appear before Special Magistrate J.  
Jefferson Overby, at Key West Old City Hall, 510 Greene Street, Key West, FL, on  
January 30, 2013 at 1:30 p.m., to testify in this action and to have with you at that time  
and place the following:**

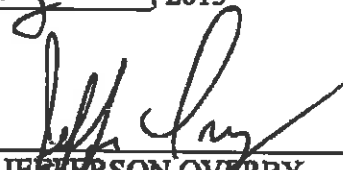
**All documents in your possession concerning, referring to or relating to**

the employer/employee relationship for the business known as KWSC, Inc. DBA Adult Entertainment Club located at 1221 Duval Street, Key West, FL 33040. Such documents shall include:

1. All payroll records including W2's, W4's or 1099-MISC from 2008 to present.
2. Workers compensation and unemployment records from 2008 to present.
3. Receipts for advertising including payment receipts for  
the Adult Entertainment Club advertising cards from 2008 to present.
4. Any and all documents provided to employees for  
work schedules, policies, standards and training from 2008 to present.
5. Documents or written contracts for employee type benefits (i.e. pension plan,  
insurance, vacation pay, etc) from 2008 to present.
6. Any other document(s) or records showing the existence of the employer/employee  
relationship.

You are subpoenaed by the Special Magistrate, and unless excused from this subpoena by the Special Magistrate, you shall respond to this subpoena as directed.

DATED on this 15<sup>th</sup> day of January, 2013

  
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J. JEFFERSON OVERBY  
Special Magistrate  
City of Key West  
Code Compliance