

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE:

Chapter 9

Case No. 13-53846

City of Detroit, Michigan,

Debtor.

**INTERESTED PARTY DAVID SOLE'S
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Interested Party David Sole, by and through his attorneys, Jerome D. Goldberg, PLLC, hereby submits to the Debtor the following Requests for Production of Documents:

1. Any and all reports of the Detroit Blight Task Force.
2. Any and all documents, reports, emails, etc., identifying which Detroit homes are being identified as blighted and subject to demolition.
3. Any and all documents, reports, emails, etc., identifying which Detroit homes identified in Requests for Production of Documents 1 or 2 are bank-owned or Fannie Mae or Freddie Mac owned.
4. Any and all documents, reports emails, etc., identifying which Detroit homes identified in Requests for Production of Documents 1 or 2 are occupied, including those which are occupied by "squatters."
5. Any and all documents, reports, emails, etc., documenting how much the City of Detroit paid in property tax charge backs to Wayne County for the years 2010 to 2014.
6. Any and all documents, reports, emails, etc., identifying which Detroit homes were the source for the charge backs paid by the City of Detroit.



7. Any and all documents, reports, emails, etc., identifying which Detroit homes that were the source for the charge backs paid by the City of Detroit were bank-owned or owned by Fannie Mae or Freddie Mac.

8. A list of all corporations based in the city of Detroit that are receiving property tax abatements, and any and all documents regarding the tax abatements.

9. Any and all reports, studies, emails, etc., establishing compliance of corporations identified in Request for Production 8 with the terms of the property tax abatements.

10. A copy of all contracts with professional consultants or any other individuals who received professional fees as identified in the attached Mulhatra report for the years 2013-2014. (See Exhibit 1)

11. A copy of all reports issued by professional consultants or any other individuals who received professional fees as identified in the attached Mulhatra report for the years 2013-2014. (See Exhibit 1)

12. Any and all documents establishing the work performed by consultants or any other individuals who received professional fees as identified in the attached Mulhatra report for the years 2013-2014 (see Exhibit 1), including hours spent on the work and payment per hour for work performed.

13. A copy of all documents leading to the payment of termination fees to swap counterparties for the years 2010-2012 in connection with interest rate swaps with the Detroit Water and Sewerage Department, including documents that establish the basis for the payment of the termination fees and the amount paid.

14. Any and all correspondence between Emergency Manager Kevyn Orr and the Securities and Exchange Commission.

15. Any and all correspondence between the City of Detroit and State of Michigan regarding the payment of revenue sharing from the State to the City from 2005 to the present.

16. Any and all documents that establish the authority of the Emergency Manager to privatize or sell the Detroit Public Lighting Department.

17. Any and all documents that establish the authority of the Emergency Manager to privatize or sell the Detroit Water and Sewerage Department.

18. Any and all correspondence, offers, bids, etc., to any private entity in connection with the possible sale of the Detroit Water and Sewerage Department.

19. Any and all documents, emails, correspondence, etc., with the Michigan State Housing Development Authority concerning the distribution and procurement of Helping Hardest Hit Homeowner funds by the City of Detroit either for its own behalf or on behalf of City residents.

20. Any and all documents, emails, correspondence, etc., with the United States Department of Treasury concerning the distribution and procurement of Helping Hardest Hit Homeowner funds by the City of Detroit either for its own behalf or on behalf of City residents.

21. Any and all documents pertaining to the receipt of federal CSBG grant funds from the State of Michigan by the City of Detroit and the distribution of those funds for the years 2011-2014.

22. Any and all documents, emails, correspondence, etc., between the City of Detroit and the Obama administration or any of its departments for the years 2012-2014.

23. Any and all correspondence with Moody's, Standard and Poors, and Fitch Ratings Services, including emails from 2005 to the present.

24. Any and all studies by any department of the City of Detroit concerning the role of the banks in the City's foreclosure crisis for the years 2004 to the present.

25. Any and all studies by the City of Detroit in connection with the impact of Libor fraud by Bank of America, United Bank of Switzerland or any other financial institution on the City of Detroit's finances.

26. Any documents that establish the number of City of Detroit workers employed in union positions for each year from 2005 to the present, and the total amount in wages paid to the union employees for each year.

27. Any and all documents establishing expenditures by and revenues received by the Parking Violations Bureau.

Respectfully submitted,

JEROME D. GOLDBERG, PLLC

By: /s/ Jerome D. Goldberg
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DATED: April 11, 2014

EXHIBIT 1

Tentative and Preliminary Draft - Subject to Material Modification

City of Detroit

Monthly Cash Flow Forecast FY 2015
(\$ in millions)

	5	4	4	5	4	4	5	4	4	5	4	4	5	4	4	Forecast FY 2015
	Forecast Jul-14	Forecast Aug-14	Forecast Sep-14	Forecast Oct-14	Forecast Nov-14	Forecast Dec-14	Forecast Jan-15	Forecast Feb-15	Forecast Mar-15	Forecast Apr-15	Forecast May-15	Forecast Jun-15				
Operating Receipts																
Property taxes	\$ 27.5	\$ 149.0	\$ 23.1	\$ 11.9	\$ 3.6	\$ 41.5	\$ 106.2	\$ 12.9	\$ 2.1	\$ -	\$ -	\$ 10.3	\$ 388.0			
Income & utility taxes	28.5	22.5	22.1	28.1	22.5	22.1	28.1	23.3	22.5	28.1	22.1	22.5	292.6			
Gaming taxes	14.4	14.0	8.9	22.8	10.3	9.3	21.9	9.8	14.9	17.2	13.0	11.6	168.2			
Municipal service fee to casinos	-	7.5	-	-	4.1	4.1	1.7	-	-	-	-	-	17.4			
State revenue sharing	32.1	-	32.1	-	32.1	-	32.1	-	32.1	-	32.1	-	192.7			
Other receipts	33.3	31.9	32.0	39.0	32.4	32.0	39.0	33.5	32.7	39.3	32.3	32.4	409.6			
Financing proceeds	20.0	-	-	294.8	-	-	-	-	-	-	-	-	314.8			
Total operating receipts	155.8	224.8	118.1	396.6	104.9	109.0	229.1	79.5	104.3	84.7	99.6	76.8	1,783.2			
Operating Disbursements																
Payroll, taxes, & deductions	(33.3)	(28.9)	(29.0)	(38.1)	(29.2)	(29.3)	(33.8)	(29.3)	(29.3)	(38.3)	(29.3)	(29.3)	(377.1)			
Health benefits	(7.6)	(7.6)	(7.7)	(7.7)	(7.8)	(7.8)	(7.4)	(7.3)	(7.3)	(7.3)	(7.3)	(7.3)	(90.1)			
Retirement contributions (actives)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(33.3)			
Subsidy payments	(5.8)	(5.8)	(3.3)	(3.3)	(3.3)	(3.3)	(3.3)	(3.3)	(3.3)	(3.3)	(3.3)	(3.3)	(44.4)			
Distributions - tax authorities	-	(79.4)	(20.2)	(6.6)	(6.6)	(4.9)	(17.2)	(67.5)	(15.5)	(1.6)	-	(2.3)	(222.0)			
Distributions - UTGGO (unsecured)	-	(1.9)	-	-	-	-	-	-	(9.9)	-	-	-	(11.8)			
Income tax refunds	(2.6)	(1.1)	(1.3)	(2.1)	(1.0)	(0.4)	(0.5)	(0.3)	(0.3)	(1.9)	(1.0)	(4.5)	(10.0)			
A/P and other miscellaneous	(69.5)	(50.0)	(54.8)	(39.4)	(52.4)	(52.3)	(67.3)	(55.3)	(58.0)	(61.6)	(62.5)	(64.8)	(707.9)			
Professional fees	(7.3)	(6.1)	(7.7)	(5.9)	(20.8)	-	-	-	-	-	-	-	(47.8)			
Sub-total operating disbursements	(128.9)	(183.6)	(126.7)	(125.9)	(123.8)	(105.8)	(132.3)	(165.8)	(126.4)	(116.8)	(106.1)	(119.3)	(1,561.4)			
POC and debt related payments	(9.8)	(4.9)	(8.6)	(167.0)	(6.4)	(1.5)	(6.4)	(1.5)	(6.4)	(1.5)	(6.4)	(1.5)	(221.9)			
Hypothetical creditor note payments (net)	-	-	-	-	-	-	-	-	-	-	-	-	-			
Total disbursements	(138.6)	(188.4)	(135.3)	(292.9)	(130.2)	(107.3)	(138.7)	(167.3)	(132.8)	(118.3)	(112.6)	(120.8)	(1,783.3)			
Net cash flow	17.2	36.4	(17.2)	103.7	(25.3)	1.7	90.4	(87.8)	(28.5)	(33.6)	(13.0)	(44.0)	(0.0)			
Cumulative net cash flow	17.2	53.6	36.4	140.1	114.8	116.5	206.9	119.1	90.6	57.0	44.0	(0.0)				
Beginning cash balance	109.4	126.6	163.0	145.8	249.5	224.2	225.9	316.3	228.5	200.0	166.4	153.4	109.4			
Net cash flow	17.2	36.4	(17.2)	103.7	(25.3)	1.7	90.4	(87.8)	(28.5)	(33.6)	(13.0)	(44.0)	(0.0)			
Cash before required distributions	126.6	163.0	145.8	249.5	224.2	225.9	316.3	228.5	200.0	166.4	153.4	109.4	109.4			
Accumulated property tax distributions	(32.0)	(61.7)	(35.6)	(56.2)	(51.8)	(70.5)	(126.5)	(68.4)	(44.5)	(42.9)	(42.9)	(35.3)	(35.3)			
Cash net of distributions	\$ 74.6	\$ 101.4	\$ 90.3	\$ 193.3	\$ 172.5	\$ 155.5	\$ 189.8	\$ 160.1	\$ 155.5	\$ 123.5	\$ 110.5	\$ 74.1	\$ 74.1			
Memo: (not included in cash flows above)																
Refunding bonds / self insurance escrow	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9			
Reimbursements owed to other funds	thd	thd	thd	thd	thd	thd	thd	thd	thd	thd	thd	thd	thd			

Memorandum (not included in cash flows above)

Refunding bonds / self insurance escrow
Reimbursements owed to other funds

66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9	66.9
ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid	ibid

Tentative and Preliminary Draft - Subject to Material Modification

City of Detroit
Monthly Cash Flow Forecast FY 2014
(\$ in millions)

	5	4	4	5	4	4	5	4	4	5	4	4	8A + 4F FY 2014
	Actual Jul-13	Actual Aug-13	Actual Sep-13	Actual Oct-13	Actual Nov-13	Actual Dec-13	Actual Jan-14	Actual Feb-14	Forecast Mar-14	Forecast Apr-14	Forecast May-14	Forecast Jun-14	
Operating Receipts													
Property taxes	\$ 32.7	\$ 177.5	\$ 27.5	\$ 14.1	\$ 4.3	\$ 49.4	\$ 126.5	\$ 15.3	\$ 2.5	\$ -	\$ -	\$ 12.2	\$ 462.0
Income & utility taxes	25.8	21.8	21.0	25.0	15.6	23.4	25.6	25.7	23.8	28.8	23.8	23.8	284.2
Gaming taxes	21.2	12.7	17.5	15.6	14.5	9.7	13.5	11.7	17.2	15.4	11.9	13.2	174.1
Municipal service fee to casinos	-	7.3	-	-	4.0	4.0	1.7	-	-	-	-	-	17.0
State revenue sharing	30.1	-	30.5	-	32.2	-	32.0	-	31.6	-	31.2	-	187.6
Other receipts	31.8	33.7	26.5	33.2	25.1	27.9	29.0	46.1	20.0	25.2	19.7	20.0	338.2
Financing proceeds	-	-	-	-	-	-	-	-	-	117.9	-	-	117.9
Total operating receipts	141.6	252.9	123.1	87.9	95.6	114.4	228.3	98.9	95.1	187.3	86.6	69.2	1,581.0
Operating Disbursements													
Payroll, taxes, & deductions	(33.9)	(29.4)	(25.9)	(33.4)	(25.7)	(26.1)	(27.8)	(25.4)	(26.8)	(36.0)	(27.4)	(27.4)	(345.3)
Health benefits	(13.8)	(14.5)	(17.5)	(15.2)	(21.0)	(21.1)	-	(36.8)	(14.2)	(12.2)	(10.2)	(7.3)	(183.6)
Retirement contributions (actives)	-	-	-	-	-	-	-	-	(7.9)	(7.9)	(7.9)	(7.9)	(31.8)
Subsidy payments	(3.3)	(0.1)	(8.7)	(1.8)	(0.1)	(0.2)	(5.9)	(13.7)	(4.4)	(4.4)	(4.4)	(4.4)	(51.3)
Distributions - tax authorities	-	(83.2)	(20.7)	(6.8)	(6.8)	(5.0)	(17.6)	(69.2)	(26.1)	(1.6)	-	(2.4)	(239.4)
Distributions - UTGO (unsecured)	-	-	-	-	-	-	-	-	-	-	-	-	-
Distributions - TIFs	-	-	-	-	-	-	(6.7)	-	-	-	-	(4.1)	(10.8)
Income tax refunds	(2.6)	(1.1)	(1.3)	(2.1)	(1.0)	(0.4)	(0.5)	(0.3)	(0.3)	(1.9)	(1.0)	(4.5)	(17.0)
A/P and other miscellaneous	(44.2)	(24.6)	(24.0)	(37.9)	(30.4)	(38.4)	(37.3)	(27.9)	(39.0)	(64.8)	(56.5)	(56.5)	(501.7)
Professional fees	(2.3)	(1.8)	(1.0)	(1.0)	(4.5)	(9.2)	(1.9)	(3.6)	(14.1)	(14.1)	(14.4)	(14.1)	(82.2)
Sub-total operating disbursements	(100.2)	(154.7)	(99.2)	(98.2)	(89.4)	(100.5)	(97.8)	(176.9)	(132.8)	(142.9)	(121.8)	(128.6)	(1,463.0)
POC and debt related payments	(11.6)	(4.2)	(7.3)	(4.2)	(9.1)	(0.0)	(9.1)	(4.2)	(12.2)	(4.2)	(9.8)	(3.7)	(79.8)
Hypothetical creditor note payments (net)	-	-	-	-	-	-	-	-	-	-	-	-	-
Total disbursements	(111.8)	(159.0)	(106.5)	(102.5)	(98.5)	(100.5)	(107.0)	(181.1)	(105.0)	(147.2)	(131.5)	(132.3)	(1,542.9)
Net cash flow	29.8	93.9	16.6	(14.6)	(2.9)	13.9	121.3	(82.2)	(69.8)	40.2	(45.0)	(63.1)	38.1
Cumulative net cash flow	29.8	123.7	140.3	125.7	122.8	136.7	258.1	175.9	106.0	146.2	101.2	38.1	
Beginning cash balance	71.3	101.1	195.0	211.6	197.0	194.2	208.0	329.4	247.2	177.3	217.5	172.5	71.3
Net cash flow	29.8	93.9	16.6	(14.6)	(2.9)	13.9	121.3	(82.2)	(69.8)	40.2	(45.0)	(63.1)	38.1
Cash before required distributions	101.1	195.0	211.6	197.0	194.2	208.0	329.4	247.2	177.3	217.5	172.5	109.4	109.4
Accumulated property tax distributions	(56.9)	(85.7)	(83.1)	(86.2)	(82.4)	(115.5)	(189.0)	(131.9)	(50.8)	(49.2)	(49.2)	(35.3)	(35.3)
Cash net of distributions	\$ 44.3	\$ 109.4	\$ 128.5	\$ 110.8	\$ 111.7	\$ 92.6	\$ 140.4	\$ 115.3	\$ 126.5	\$ 168.3	\$ 123.4	\$ 74.1	\$ 74.1
Memo: (not included in cash flows above)													
Refunding bonds / self insurance escrow	86.9	86.9	86.9	86.9	86.9	86.9	86.9	86.9	86.9	86.9	86.9	86.9	86.9
Reimbursements owed to other funds	tbid	tbid	tbid	tbid	tbid	tbid	tbid	tbid	tbid	tbid	tbid	tbid	tbid