



**Court:** Rush County District Court  
**Case Number:** 2018-DM-000019  
**Case Title:** Tyce Bonjorno, Petitioner vs. Tara Lynn Jennings, Respondent  
**Type:** Non-Party Subpoena of Business Records (LaCrosse Police Department)

SO ORDERED.

*Pamela Davis*

/s/ Pamela Davis, Clerk of the District Court

Gregory A. Schwartz, #19902  
Schwartz & Park, L.L.P.  
1401 Main St. Ste A  
P.O. Box 1144  
Hays, Kansas 67601  
(785) 625-0024 (phone)  
(785) 261-9044 (fax)  
[greg@splaw.legal](mailto:greg@splaw.legal)  
Attorney for Respondent

**IN THE DISTRICT COURT OF RUSH COUNTY, KANSAS**

**TYCE BONJORNO, Individually  
and as Father and Next Friend of  
DOMINIC A. BONJORNO,  
INDI L. BONJORNO, and  
HENDRIX A. BONJORNO,**

**Petitioner,**

**and**

**Case No. 18-DM-19**

**TARA LYNN JENNINGS,**

**Respondent.**

**NON-PARTY SUBPOENA OF BUSINESS RECORDS**

**TO: RECORDS CUSTODIAN  
LaCrosse Police Department  
1105 Main Street  
LaCrosse, Kansas 67548**

1. You are commanded to deliver, by mail or otherwise, a true and correct copy of all of the records listed below to the Office of Gregory A. Schwartz, 1401 Main St., Ste A, Hays, Kansas, within 14 days after receipt of this. Failure to comply with this subpoena may be deemed as contempt of Court.

2. Records to be produced:

**a. Any and all LaCrosse Police Department records, reports, complaints, photos, audio/video recordings and affidavits involving Tara Lynn Jennings (DOB: 04/16/77) and/or Tyce Anthony Bonjorno (DOB: 01/22/74), from January 1, 2013, to present, in your possession;**

3. You may make written objection to the production of any or all of the records listed above by serving such written objection upon GREGORY A. SCHWARTZ, of SCHWARTZ & PARK, LLP, PO Box 1144, Hays, Kansas 67601, within 14 days after service of this subpoena. If such objection is made, the records need not be produced except upon Order of the Court.

4. The copy of the records shall be separately enclosed in a sealed envelope or wrapper on which the title and number of the action, name and address of the witness and the date of this subpoena are clearly inscribed. If return of the copy is desired, the words "return requested" must be inscribed clearly on the sealed envelope or wrapper. The sealed envelope or wrapper shall be delivered or mailed to Gregory A. Schwartz, 1401 Main St., PO Box 1144, Hays, KS.

5. The records described in this subpoena shall be accompanied by the affidavit of a custodian of the records, a form for which is attached to this subpoena.

6. If the business has none of the records described in this subpoena, or only part thereof, the affidavit shall so state, and the custodian shall send only those records of which the custodian has custody. When more than one person has knowledge of the facts required to be stated in the affidavit, more than one affidavit may be made.

7. The reasonable costs of copying the records may be demanded of the party causing this subpoena to be issued. If the costs are demanded, the records need not be produced until the costs of copying are advanced.

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**AFFIDAVIT OF CUSTODIAN OF BUSINESS RECORDS**

STATE OF KANSAS  
COUNTY OF \_\_\_\_\_,

I, \_\_\_\_\_, being first duly sworn, on oath, depose and say that:

1. I am a duly authorized custodian of the business records of \_\_\_\_\_,  
\_\_\_\_\_ *d/b/a* \_\_\_\_\_, *or any other entity which* \_\_\_\_\_ *has management  
of ownership* and have the authority to certify those records.

2. The copy of the records attached to this affidavit is a true copy of the records described in the subpoena.

3. The records were prepared by the personnel or staff of the business, or persons acting under their control, in the regular course of the business at or about the time of the act, condition or event recorded.

\_\_\_\_\_  
Signature of Custodian

SUBSCRIBED AND SWORN to before the undersigned on the \_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

**CERTIFICATE OF MAILING**

I hereby certify that on the \_\_\_\_ day of \_\_\_\_\_, 2019, I mailed the original *Affidavit of Custodian of Business Records* to CLERK OF THE DISTRICT COURT, Rush County, 715 Elm Street, P.O. Box 387, LaCrosse, Kansas 67548 by depositing it with the United States Postal Service for delivery with postage prepaid with a copy to GREGORY A. SCHWARTZ, Schwartz & Park, L.L.P., 1401 Main St., Ste A, P.O. Box 1144, Hays, Kansas 67601.

\_\_\_\_\_  
Signature of Custodian

SUBSCRIBED AND SWORN to before the undersigned on the \_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
NOTARY PUBLIC

(SEAL)

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**PERSONAL SERVICE  
RETURN OF SERVICE**

I hereby certify that on the \_\_\_\_ day of \_\_\_\_\_, 2019, I served the *Subpoena of Business Records and Affidavit of Custodian of Business Records* by \_\_\_\_\_  
\_\_\_\_\_ upon \_\_\_\_\_ at  
\_\_\_\_\_, \_\_\_\_\_, Rush County, Kansas.

\_\_\_\_\_  
Deputy/Process Server of Rush County, Kansas