

**DEPARTMENT OF THE ATTORNEY GENERAL  
STATE OF HAWAI'I**

IN RE INVESTIGATION OF:                    )       SUBPOENA  
  )         
MAUI FIRES                                    )         
AUGUST 7 - 10, 2023                        )       AG Subpoena No. 2023-105  
\_\_\_\_\_)         
\_\_\_\_\_)

**SUBPOENA DUCES TECUM**

TO: County of Maui  
c/o Corporation Counsel, County of Maui  
Department of the Corporation Counsel  
200 S. High St.  
Kalana O Maui Bldg., 3<sup>rd</sup> Fl.  
Wailuku, HI 96793

YOU ARE HEREBY COMMANDED to appear at 1955 Main Street, Suite 401, Wailuku, Hawai'i 96793, on the 12th day of January, 2024, at 9 a.m. to be examined under oath regarding: Documents described in Exhibit 1.

YOU ARE FURTHER COMMANDED to bring with you original copies of books, records, papers, documents, including those electronically stored, or other objects as follows: Documents described in Exhibit 1.

This subpoena is issued pursuant to section 28-2.5, Hawaii Revised Statutes.

OBEDIENCE to this subpoena may be enforced by the Circuit Court of the Second Circuit.

DATED: Honolulu, Hawai'i, December 28, 2023.

*Anne E. Lopez*

\_\_\_\_\_  
ATTORNEY GENERAL  
STATE OF HAWAI'I

**If this box is checked, it may not be necessary to appear in person. To make arrangements to produce records and information without appearing in person, please call:**

Contact Person: Deputy Attorney General Ciara Kahahane  
Telephone No.: [REDACTED]  
Email: [REDACTED]

See Reverse Side for Recipient's Rights and Return of Service.

**RETURN OF SERVICE**

AG Subpoena No. 2023-105

Received this subpoena at \_\_\_\_\_ on \_\_\_\_\_ and  
on \_\_\_\_\_ at \_\_\_\_\_, I served it on  
the within named by delivering a copy to \_\_\_\_\_.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Signature of Serving Officer

**RECIPIENT’S RIGHTS**

You have been served with an investigative subpoena in an administrative investigation, issued by the Attorney General of the State of Hawaii, in accordance with section 28-2.5, Hawaii Revised Statutes, to produce certain records and information, and to appear at the time and place specified to give sworn testimony. **Please reach out to the “Contact Person” listed above if the box is checked that you are not required to appear in person for testimony.** Attendance is required only in the county in which the subpoena is served, or such other place as may be agreed upon by you and the issuing authority. If the subpoena is served in a county other than that in which you reside, are employed, or transact business, the Department of the Attorney General shall bear the expense of travel as provided by the rules of the court.

If you disobey this subpoena, the Attorney General may apply to the circuit court in the county in which you reside or are located to compel obedience. Prior to the date on which you are commanded to appear, you may move the circuit court to quash or modify the subpoena if compliance would be unreasonable or oppressive or violate any privilege you may be entitled to exercise in a court proceeding.

## EXHIBIT 1

1. Regarding the wildfire damage assessment map posted on the County of Maui website on August 12, 2023 (“Lahaina Fire Damage Map”), and available on the present date at <https://www.mauicounty.gov/CivicAlerts.aspx?AID=12683>:
  - a. All data on the “structure status” assigned to each building footprint shown on the Lahaina Fire Damage Map in Excel, CSV, or GIS layer format.
  - b. All sources used to determine the structure status of all building footprints shown on the Lahaina Fire Damage Map and all structures indicated as exposed, damaged, or destroyed on the Lahaina Fire Damage Map (e.g., aerial/remote sensing imagery and ground-based assessments).
  - c. All documents regarding the methodology and criteria used to determine structure status designations and how assigned to each building footprint shown on the Lahaina Fire Damage Map.
  - d. All documents regarding the terminology to be used for structure status designations on the Lahaina Fire Damage Map (i.e., Destroyed, Heavy Damage, Light Damage, Undamaged).
  - e. All documents regarding the decision to use terminology for structure status designations on the Lahaina Fire Damage Map that differs from the terminology used in the FEMA Preliminary Damage Assessment Guide, Appendix H (2021), available on the County of Maui website at [https://www.mauicounty.gov/DocumentCenter/View/130944/fema\\_2021-pda-guide-Appendix-H](https://www.mauicounty.gov/DocumentCenter/View/130944/fema_2021-pda-guide-Appendix-H).
  - f. All documents setting forth or discussing the methodology and criteria for determining which structures were designated as “exposed” on the Lahaina Fire Damage Map.
  - g. All documents setting forth the total number of structures within the “estimated fire perimeter” indicated on the Lahaina Fire Damage Map.
2. All documents regarding multi-agency exercises, drills, and/or other multi-agency emergency training activities, from 2018 up to and including 2023, for any and all personnel who were in the County of Maui’s employment on August 8, 2023.