

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES
RESPONDENT
V
GLADYS HARUN
PETITIONER

CASE NO: CR 323-003

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

JAN 24 2025

FILED

MOTION TO COMPEL JACKSON HEWITT TAX SERVICE COMPANY TO
SURRENDER BUSINESSS DOCUMENTS FOR GLADYS HARUN

comes now petitioner Gladys Harun in pro se and hereby move this honorable court to issue an order compelling Jackson Hewitt tax Service to surrender various franchisee business documents to her.

Petitioner asserts that she intends to file a 2255 motion. These records from Jackson Hewitt are necessary for preparation of such pleadings and are defendant's property. Petitioner was a franchisee ^{Exhibit 3} with Jackson Hewitt before incarceration (see attached franchisee agreement document). Petitioner has contacted this company ~~and~~ even through her family but Jackson Hewitt has ignored her request and failed to give her the required documents.

Petitioner seeks the active protection of this court through a court order directing Jackson Hewitt to release her documents. Gladys Harun's entity with Jackson Hewitt was 3332 GYH.

Petitioner urgently need these documents from Jackson Hewitt:

1.) Ireceivable transaction details for 2019, 2020 and 2021
2.) Employee clock in hours for 2019, 2020 and 2021

3.) Employee bonus list for 2019, 2020 and 2021
4.) Gross revenue lists for 2019, 2020 and 2021
5.) Net revenue lists for 2019, 2020 and 2021
6.) Discounts given on returns for 2019, 2020 and 2021
7.) proof that Gladys Harun was a franchisee from 2016 to 2022.
8.) Total counts on stimulus returns that Gladys did charging 25\$ only for 2020 and 2021.
9.) Total refunds amounts for her entity for 2019, 2020 and 2021

petitioner moves this court to issue an order compelling the following individuals to surrender the above mentioned document

1. SONIA MILLHOUSE

TEL: 941-724-9730

Title: Regional Director of Franchisee Commercial Operations

Address: 501 N Cattleman Rd suite 300
Sarasota Florida 34232

2. VICTORIA MCSHANE

Title: Director, Franchisee Administration and Compliance

Address: 501 N Cattleman Rd suite 300

sarasota Florida 34232

3. JACKSON HEWITT INC

10 exchange place 27th floor

Jersey city, NJ 07302

Kindly print the requested documents in black and white then mail one copy to

1. Gladys Harun

Fed no: 09407510

dorm B1

Alderson Federal Prison Camp

One Glen Ray Rd Box A

Alderson WV 24910

Also mail another copy to :

2. Simon Guchu

4807 Greenfield Dr

Berrien Springs MI 49103

Done this on date-01/13/2025-----

Respectively submitted

Gladys Harun

FRANCHISE AGREEMENT ADDENDUM

THIS ADDENDUM TO THE FRANCHISE AGREEMENT is by and between Jackson Hewitt Inc. ("Franchisor") and Gladys Harun ("Franchisee") dated as of July 12, 2017, Entity # 3332, Territory # GA039 ("the Agreement").

1. Paragraph 4.2 of the agreement is deleted in its entirety and in lieu thereof replaced with:

4.2. *Royalties.* During the Term, you must pay us a continuing royalty fee (the "Royalty") determined as follows:

- (a) during the 1st Reporting Year of the Storefront, your Royalty will be an amount equal to 5% of your Gross Volume of Business, subject to a minimum Royalty during this Reporting Year of \$1,500;
- (b) during the 2nd Reporting Year of the Storefront, your Royalty will be an amount equal to 10% of your Gross Volume of Business, subject to a minimum Royalty during this Reporting Year of \$4,000; and
- (c) for each subsequent Reporting Year of the Storefront, you Royalty will be an amount equal to 15% of your Gross Volume of Business, subject to a minimum Royalty during the Reporting Year of \$5,250.

2. Paragraph 11.5 of the agreement is deleted in its entirety and in lieu thereof replaced with:

11.5. *Opening.* You must open your Franchised Business and be fully operational by the start of the second Tax Season immediately following the Effective Date of this Agreement, and you must be open and fully operational by the start of each subsequent Tax Season during the Term, unless we authorize a later date. You may open your Franchised Business only if the Location meets the opening standards set forth in the Operating Standards.

3. Except as expressly stated in this Addendum, no further additions, modifications or deletions to the Agreement are intended by the parties or made by this Addendum.

4. The terms of this Addendum and the special stipulations provided for herein are expressly confidential between the parties. If for any reason the terms of this Agreement become known to any third party, with the exception of Franchisee's legal counsel, then these special stipulations may become null and void.

5. All capitalized terms not otherwise defined herein shall have the respective meanings given such terms in the Agreement.

IN WITNESS WHEREOF, the parties hereto have caused this Addendum to be executed on July 12, 2017.

FRANCHISEE: Gladys Harun

DocuSigned by:

Gladys Harun

By: _____

CC86E918342643C...

Name: Gladys Harun

Title: Sole Proprietor

FRANCHISOR: Jackson Hewitt Inc.

DocuSigned by:

Victoria McShane

By: _____

37BB6634C82944B...

Name: Victoria McShane

Title: Director, Franchise Compliance

Gladys Harin

Fed No: 09407510

Dorm B1

Federal Prison Camp

One Glen Ray Rd

Box A

Anderson WV 24910



Retail



30901

RDC 99

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⇌09407-510⇌

United States Court
600 James Brown BLVD
Southern District
Augusta, GA 30901
United States