

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAMES A. KNAUER as the Court Appointed)
Receiver for HEARTLAND)
FINANCIAL SERVICES, INC., JMS)
INVESTMENT GROUP, LLC, ATLAS)
INCOME FUND, LLC, BMC INVESTMENT) CASE NO: 1:03-CV-0279JDT-TAB
GROUP, LLC, DOLPHIN INTERNATIONAL)
DEVELOPMENT, LTD., BELIZE ESCROW)
SERVICES, HEARTLAND MONEY)
MANAGEMENT OF FLORIDA, INC.,)
LINCOLN FIDELITY ESCROW SERVICES,)
MDS INVESTMENT, INC., and 21ST)
CENTURY INTERNATIONAL ADVISORS,)
INC.)
)
Plaintiff,)
)
v.)
)
LESLIE REED,)
)
Defendant.)

RECEIVER'S FIRST SET OF INTERROGATORIES
TO DEFENDANT LESLIE REED

James A. Knauer, (the "Receiver"), the Receiver for Heartland Financial Services, Inc., JMS Investment Group, LLC, and their alter egos (collectively, "Heartland"), hereby requests the Defendant, Leslie Reed, to answer the following Interrogatories fully, in writing, under oath, and within thirty (30) days from the date of service hereof, pursuant to Rule 33 of the Federal Rules of Civil Procedure.

INTERROGATORY NO. 1: Identify each person whom you consulted for information or assistance in the preparation of your responses to these Interrogatories, excluding anyone who simply typed or reproduced the responses.

ANSWER:

INTERROGATORY NO. 2: In paragraph 3 of your Response to the Receiver's Complaint against you, you deny that you received the sum of \$20,000 from Heartland as a retainer for legal services. With respect to that general denial, state the following:

- A. Did you receive the sum of \$20,000 from Heartland?
- B. If the sum of \$20,000 was remitted by Heartland to you for a purpose or purposes other than as a retainer for legal services, for what purpose(s) was that sum paid to you?
- C. What facts otherwise support your general denial of Count I, paragraph 3 of the Receiver's Complaint?
- D. Provide the name and address of those persons who can testify as to those facts.

ANSWER:

INTERROGATORY NO. 3: By the general denial stated in paragraph 4 of your Response to the Receiver's Complaint, you have averred that legal services were, in fact, required to be performed by you at the behest or on behalf of Heartland. With respect to your contention that you provided legal services to Heartland, state the following:

- A. What legal services did you perform?
- B. During what period of time did you perform those legal services?
- C. What additional facts, if any, support your general denial of Count I, paragraph 4 of the Receiver's Complaint?
- D. Provide the name and address of those persons who can testify as to those facts.

ANSWER:

INTERROGATORY NO. 4: In paragraph 5 of your Response to Complaint, you deny that you received the sum of \$25,000.00 as a loan from Heartland, which loan has not been repaid in whole or in part. With respect to that general denial, state the following:

- A. Did you receive the sum of \$25,000 from Heartland?

- B. If the sum of \$25,000 was remitted by Heartland to you for a purpose or purposes other than as a loan, for what purpose(s) was that sum paid to you?
- C. If you received the sum of \$25,000 as a loan from Heartland, have you repaid the sum of \$25,000 Heartland, in whole or in part?
- D. If you contend that you received the sum of \$25,000 from Heartland, but that you have repaid that sum to Heartland in whole or in part, identify the date(s) when you remitted any payment(s) to Heartland, and the amount of any such payment(s).
- E. What facts otherwise support your general denial of Count I, paragraph 5 of the Receiver's Complaint?
- F. Provide the name and address of those persons who can testify as to those facts.

ANSWER:

INTERROGATORY NO. 5: In paragraph 6 of your Response to the Receiver's Complaint, you deny that you have been unjustly enriched by the payments which you received from Heartland, and you deny that the payments constituting that unjust enrichment are recoverable by the Receiver. With respect to that general denial, state the following:

- A. What facts support your denial of the allegation that you have been unjustly enriched?
- B. What facts support your denial of the allegation that the Receiver is entitled to recover the two payments which Heartland made to you?
- C. Provide the name and address of those persons who can testify as to those facts.

ANSWER:

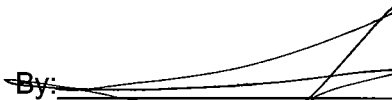
INTERROGATORY NO. 6: Other than the facts recounted in your responses to the preceding Interrogatories, state the following:

- A. What facts support your demand that judgment not be entered against you?
- B. What facts support your demand that the Receiver's Complaint against you be dismissed?

C. Provide the name and address of those persons who can testify as to those facts.

ANSWER:

KROGER, GARDIS & REGAS, LLP

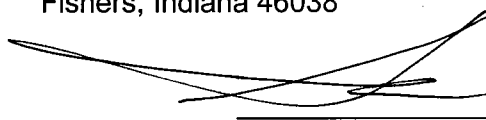
By: 
Samuel D. Hodson, #10842-41

KROGER, GARDIS & REGAS, LLP
111 Monument Circle, Suite 900
Indianapolis, Indiana 46204-5125
(317) 692-9000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served upon the following parties by placing a copy of the same in the United States Mail, first class postage pre-paid, on this 21 day of April, 2003:

Leslie Reed
9924 Tudor Court
Fishers, Indiana 46038



KROGER GARDIS & REGAS, LLP
111 Monument Circle, Suite 900
Indianapolis, Indiana 46204-5125
(317) 692-9000

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