

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JAMES A. KNAUER as the Court Appointed)
Receiver for HEARTLAND)
FINANCIAL SERVICES, INC., and JMS)
INVESTMENT GROUP, LLC,)

Plaintiff,)

CAUSE NO. IP01-1168-C-T/K

v.)

JONATHON ROBERTS FINANCIAL)
GROUP, INC.,)
ALLIANCE CAPITAL MANAGEMENT)
CORP.,)
ANDOVER SECURITIES INC.,)
FSC SECURITIES, CORPORATION, and)
FFP SECURITIES, INC.,)

Defendants.)

INITIAL PRETRIAL DISCLOSURES

Plaintiff, James A. Knauer as the Court Appointed Receiver for Heartland Financial Services, Inc. et al, by counsel, hereby tenders to Defendants, the following initial disclosures pursuant to Fed. R. Civ. P. 26 and as required by the Case Management Plan filed January 8, 2002.

A. Individuals with Discoverable Information

1. **James A. Knauer**
Receiver for Heartland Financial Services, Inc.
and JMS Investment Group, LLC
2. **Kara M. Washington**
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Scott J. Hlavacek
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3. **Kenneth R. Payne**
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Mark Inman
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4. **Daniel G. Danker**
William E. Marsh
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317-383-3520

5. **Johann M. Smith**
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6. **Constance Brooks-Kiefer**
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7. **Donna A. Eide**
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B. Documents Supporting Plaintiff's Claim

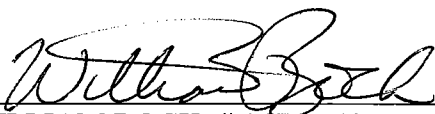
1. Business records of Heartland Financial Services, Inc.
2. Business records of JMS Investment Group, LLC
3. Investor's files of Heartland Financial Services, Inc.
4. Investor's files of JMS Investment Group, LLC.
5. Documentation pertaining to the Administration of the Receivership Estate.
6. Documentation reflecting claims made by investors against Heartland Financial Services.
7. Documentation reflecting claims made by investors against JMS Investment Group, LLC.
8. All recorded statements and/or depositions of any individuals with information relating to the subject matter of this litigation.
9. All pleadings pertaining to the criminal cases against individuals relating to the subject matter of this litigation.
10. Documentation relating in any way to the SEC's investigation relating to the subject matter of this litigation.
11. Documentation relating in any way to the FBI's investigation relating to the subject matter of this litigation.
12. Documentation relating in any way to the U.S. Attorney's prosecution of individuals relating to the subject matter of this litigation.
13. Documentation and/or summaries of documents supporting plaintiff's computation of damages.

C. Computation of Damages and Supporting Documents

A computation of the damages is currently being prepared by accountants for the Receivership Estate. Such computations and the documents supporting such will be disclosed upon their completion.

Respectfully submitted,

KROGER, GARDIS & REGAS, LLP

By: 
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of March, 2002, a true and accurate copy of the above and foregoing pleading was served by depositing the same in the United States mail, first class, postage prepaid to:

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