

EXHIBIT "D"

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES)
AND EXCHANGE COMMISSION,)
)
Plaintiff,)
)
KENNETH R. PAYNE, JOHANN M. SMITH,)
DANIEL G. DANKER, CONSTANCE)
BROOKS-KIEFER, HEARTLAND FINANCIAL)
SERVICES, INC., AND JMS INVESTMENT)
GROUP, LLC.)
)
Defendants.)

Civil Action No. IP00-1265 C -T/K

**NOTICE OF FILING OF RECEIVER'S MOTION
FOR ALLOWANCE AND DISALLOWANCE OF CLAIMS**

To: **Certain creditors of Heartland Financial Services, Inc., JMS Investment Broup, LLC, Aero Technolgias Ltd., Atlas Income Fund, LLC, BMC Investment Group, LLC, Carribean Federal Trust, Ltd., Carribean Federal Services, Ltd., Carribean Financial Services, Carribean Investments International, Ltd., Celtic Centre II, Ltd., Charmar, Ltd., Dolphin International Development, Ltd., Dolphin Peninsula Partners, First Fidelity Trust, Ltd., First International Limited, Heartland Advisory Services, Inc., Heartland Financial Services, Inc., Heartland International Trust Services, Ltd., Heartland Money Management of Florida, Inc., International Leisure Centers, Inc., JMS Investment Group, LLC, KJL Ltd. of Belize, Lincoln Fidelity Escrow Services, MDS Investment, Ltd., PMK, Ltd., RMP, Ltd., Terens, Ltd., 21st Century Banking Group, Ltd., 21st Century International Bank & Trust, Ltd. of Grenada, 21st Century International Advisors, Inc., 21st Century International, Advisors of Bermuda, Ltd., 21st Century International Advisors of Ireland, Ltd., 21st Century Personnel, LLC, and Universal Financial Services, Ltd.**

You are hereby notified that James A. Knauer, the Receiver for each of the above listed companies has filed a *Receiver's Motion for Allowance and Disallowance of Claims* (the "Claims Motion") which contains an objection to a claim that you have filed in the Receivership proceedings. A copy of the Claims Motion is included with this notice. The Court has scheduled a hearing on the Receiver's objection to your claim at ___ o'clock EST in Room _____ of the US Court House, 141 East Ohio Street, Indianapolis, Indiana, 46204, on the ___ day of _____, 2001. If you wish to respond to the Receiver's objection, you must, at a minimum, file a written response with the Clerk of the Court at least three (3) business days prior to the hearing date and serve a copy of your response upon the Receiver, James A. Knauer, 111 Monument Circle, Suite 900, Indianapolis, Indiana, 46204-5125, setting forth reasons why you feel your claim should be allowed over the Receiver's objection. You may also choose to engage counsel and appear at the hearing to present your response. If you do not appear, the Court will consider your written response and you will receive a notice of the Court's decision.

November ____, 2001

Laura A. Briggs, Clerk U.S. District Court

Distribution:

James A. Knauer
William Bock, III
Kroger, Gardis & Regas, L.L.P.
111 Monument Circle, Suite 900
P.O. Box 44941
Indianapolis, Indiana 46244-0941

Paul A. Montoya
Kara M. Washington
Jeannette L. Lewis
United States Securities and
Exchange Commission
500 West Madison Street
Suite 1400
Chicago, Illinois 60661

Fred D. Scott
Attorney at Law
55 Monument Circle
Suite 814
Indianapolis, Indiana 46204

Dexter B. Johnson
Mallon & Johnson, P.C.
19 S. LaSalle Street
Suite 1202
Chicago, Illinois 60603

Dennis Zahn
Symmes, Voyles, Zahn, Paul & Hogan
700 Jefferson Plaza
One Virginia Avenue
Indianapolis, Indiana 46204

United National Bank
c/o Angela M. Haynes
675 Franklin Boulevard
Somerset, New Jersey 08873

Union Planters Bank, N.A.
C/o Ms. Barbara E. Branich, EVP
One Indiana Square
Suite 501
Indianapolis, Indiana 46204

NBD Bank, N.A.
c/o Bank One Corporation
Law Department
Chicago, Illinois 60671

Internal Revenue Service
P.O. Box 44985
Stop SB380
Indianapolis, Indiana 45244

Bank: American-Munster
6233 Burlington Avenue
Indianapolis, Indiana 46220-2142

Robert Wilson
6613 Robinhood Drive
Indianapolis, Indiana 46227

Ed Haskins
1429 Marble Canyon
DeSoto, Texas 75115

Anthony Rella
5 Tamarac Circle
Harrison, New York 10528

Kimberle A. Mullineux
R.R. # 2 Box 183
Bloomfield, Indiana 47424

Daniel Acton
Mary E. Lenze Acton
714 Morse Avenue
Placentia, California 92870

Rolland Eaton
15520 Gullane Court
Fort Myers, Florida 33912

Norma Hart
Patricia Joan Deer
Ronald Raymond Hard
1325 O'Dell Lane
Greenwood, Indiana 46143

The Kaufmann Living Trust
8810 Colby Boulevard
Apartment 116
Indianapolis, Indiana 46268

The McVicker Living Trust
805 West Manor Drive
Marion, Indiana 46952

Rosie Pettygrue
7806 Dartmouth Road
Indianapolis, Indiana 46260

The Robert Ruddick, Jr., Living Trust
1302 Greenbrook Drive
Indianapolis, Indiana 46229

The Sullivan Living Trust
Marital Trust
1740 Creekside Drive
Carmel, Indiana 46032-3579

Larry Sylvester
8001 Spring Water Drive
Indianapolis, Indiana 46256

Helen L. Williams
4533 Hidden Orchard Lane
Indianapolis, Indiana 46228-3024

The Winings Living Trust
6435 Chaplewood Court
Indianapolis, Indiana 46268

Marc E. and Kiyomi D. Young
8126 Raven Rock Court
Indianapolis, Indiana 46256

Virginia M. Zehr
2630 South Sheridan
Indianapolis, Indiana 46203

Thomas K. Millholland
Myra Jo Meharg
5528 Liberty Boulevard Place
Indianapolis, Indiana 46220

Internal Revenue Service:

Commissioner of Internal Revenue
Service
Charles O. Rosscotti
1111 Constitution Avenue NW
Washington D.C. 20224

Internal Revenue Service
District Director
James E. Rogers, Jr.
Federal Building
575 North Pennsylvania Street
Indianapolis, Indiana 46204

Internal Revenue Service
District Counsel's Office
Rodney Bartlett, Esquire
P. O. Box 44010
Indianapolis, Indiana 46244

United States Department of Justice
950 Pennsylvania, NW
Washington, D.C. 20530-0001