

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,)
)
Plaintiffs,)
)
v.)
)
JONATHAN ROBERTS FINANCIAL)
GROUP, INC., ALLIANCE CAPITAL)
MANAGEMENT CORP., ANDOVER)
SECURITIES, CORPORATION, FSC)
SECURITIES CORPORATION, and)
FFP SECURITIES, INC.,)
)
Defendants.)
)

Cause No: IP01-1168-C-T/K

DEFENDANT JONATHAN ROBERTS' INITIAL DISCLOSURES

Come now the Defendants Jonathan Roberts Financial Group, Inc. and Alliance Capital Management Corporation, by counsel, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and as required by the Case Management Plan filed on January 8, 2002, and submit the following initial disclosures:

A. Rule 26(a)(1)(A)

"[T]he name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information."

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10. Representatives of FSC Securities Corporation
11. Kara M. Washington
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(312) 353-6887
12. Scott J. Hlavacek
United States Securities and Exchange Commission
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B. Rule 26(a)(1)(B)

“[A] copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.”

1. All business records of Jonathan Roberts Financial Group, Inc. and/or Alliance Capital Management Corporation relevant to the subject matter of this litigation;
2. All business records of FFP Securities, Inc. relevant to the subject matter of this litigation;
3. All business records of FSC Securities Corporation relevant to the subject matter of this litigation;
4. All business records of Heartland Financial Services, Inc. and its affiliated or subsidiary companies relevant to the subject matter of this litigation;
5. All business records of JMS Investment Group, Inc. and its affiliated or subsidiary companies relevant to the subject matter of this litigation;
6. All documents generated by the receiver, James A. Knauer in connection with the claims of investors against Heartland Financial Services, Inc. and its affiliated or subsidiary companies and/or JMS Investment Group, Inc. and its affiliated or subsidiary companies;
7. Any and all documents prepared or produced in related criminal or civil litigation, including but not limited to the following proceedings:
 - A. IP00-C-1265;
 - B. IP01-C-1021;
 - C. IP01-C-1022;
 - D. IP01-C-1023;

- E. IP01-C-1024;
- F. IP01-C-1025;
- G. IP01-C-1026;
- H. IP01-C-1027;
- I. IP00-C-1629;
- J. IP01-C-1862.

8. All documents prepared for and/or posted to www.heartlandfinancialinfo.com.

C. Rule 26(a)(1)(C)

[A] computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 of the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable.

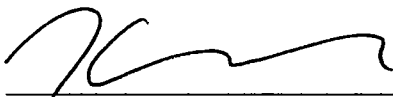
D. Rule 26(a)(1)(D)

[F]or inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

A copy of the insurance agreement applicable to the incident action has been requested from the insurance company and will be forwarded to plaintiff under separate cover upon receipt thereof.

Respectfully submitted,

LOCKE REYNOLDS LLP



Thomas E. Wheeler, II
Attorney I.D. No. 13800-49

Attorneys for the Defendants
Jonathan Roberts Financial Group, Inc.
and Alliance Capital Management Corp.

CERTIFICATE OF SERVICE

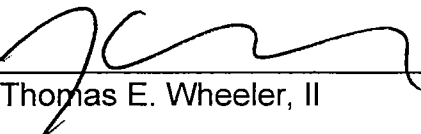
The undersigned hereby certifies that a copy of the foregoing was served by United States Mail, first-class, postage prepaid on the following counsel of record this 11th day of April, 2002:

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