

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.)

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

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

Defendants.)

DEFENDANT JONATHAN ROBERTS' PRELIMINARY WITNESS LIST

Come now the Defendants Jonathan Roberts Financial Group, Inc. and Alliance Capital Management Corporation, and submit the following list of witnesses who may be called at the trial of the above cause:

1. John R. Carlson, President
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2. R. J. Wood
Jonathan Roberts Financial Group
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4. Arlene Stock
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5. Kenneth Richard Payne

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c/o Mark Inman, Esq.
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Indianapolis, Indiana 46205
(317) 924-3545

6. Daniel Guy Danker
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Indiana Federal Community Defenders
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7. Johann M. Smith

c/o Dexter B. Johnson
MALLON & JOHNSON
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(312)

c/o Dennis Zahn, Esq.
SYMMES VOYLES ZAHN PAUL & HOGAN
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One Virginia Avenue
Indianapolis, Indiana 46204
(317) 632-4463

8. Constance Brooks-Kiefer
c/o Stephen W. Dillon, Esq.
DILLON LAW OFFICE
3601 North Pennsylvania Street
Indianapolis, Indiana 46205
(317) 923-9391

9. Representatives of FFP Securities, Inc.
Roseanne Horan
Sandra Pruet
15455 Conway Road
Chesterfield, Missouri 63107
10. Representatives of FSC Securities Corporation
11. Kara M. Washington
United States Securities and Exchange Commission
Midwest Regional Office
175 West Jackson Street, Ste. 900
Chicago, Illinois 60661
(312) 353-6887
12. Scott J. Hlavacek
United States Securities and Exchange Commission
Midwest Regional Office
175 West Jackson Street, Ste. 900
Chicago, Illinois 60661
(312) 353-6887
13. Any impeachment or rebuttal witnesses;
14. All witnesses listed by any party to this action;
15. Any other witnesses relevant to this cause of action discovered subsequent to this date will be made known to counsel immediately upon their discovery.

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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