

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

<b>JAMES A. KNAUER as the Court Appointed</b>	)	
<b>Receiver for HEARTLAND</b>	)	
<b>FINANCIAL SERVICES, INC., JMS</b>	)	
<b>INVESTMENT GROUP, LLC,</b>	)	<b>CASE NO. IP-01-1168-C T/K</b>
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>JONATHON ROBERTS FINANCIAL</b>	)	
<b>GROUP, INC., ALLIANCE CAPITAL</b>	)	
<b>MANAGEMENT CORP., ANDOVER</b>	)	
<b>SECURITIES, INC., FSC SECURITIES</b>	)	
<b>CORPORATION AND FFP SECURITIES,</b>	)	
<b>INC.,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO FSC SECURITIES CORPORATION**

The Plaintiff, James A. Knauer as Court Appointed Receiver, by counsel, tenders to Defendant, FSC Securities Corporation the following Request for Production of Documents to FSC Securities Corporation and its attorney. The Defendant is requested to produce the requested documents for inspection and copying to Reynolds B. Brissenden, at the offices of Kroger Gardis & Regas, LLP, 111 Monument Circle, Suite 900, Indianapolis, Indiana 46204-5125 within thirty (30) days after service of these requests.

**INSTRUCTIONS**

1. These requests for production of documents ("Requests for Production") are directed to the Defendant and its agents, servants, and representatives, past and present, and unless a privilege is claimed, each and every attorney, past and present, of the Defendant.

2. The Requests for Production demand all responsive documents in possession, custody, or control, of the Defendant and its attorneys, including all documents in the possession of experts, consultants or independent contractors.

### **DEFINITIONS**

1. "Any" and "all" shall be construed to mean "each and every."
2. "Document" means the original or an identical and legible copy thereof, and all non-identical copies (whether different from the original by reason of notations made on such copies or otherwise), regardless of origin or location, of any writings or records of any type or description, however produced or reproduced, including but not limited to any papers or books, records, letters, photographs, videotapes, audiotapes, correspondence, communications, voice-mail, E-mail, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews, conferences, or other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, instructions, charges, manuals, brochures, publications, schedules price lists, client lists, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer printouts, data processing program library, data processing input and output, electronic mail, microfilm, books of accounts, records and invoices reflecting business operations, all records kept by electronic, photographic or mechanical means, any notes or drafts relating to the foregoing, and all things similar to any of the foregoing, however denominated.

3. "Or" and "and" shall mean and/or.
4. The singular includes the plural and vice versa. The masculine includes the feminine and neuter genders. The past tense includes the present tense where the clear meaning is not distorted by change of tense.
5. "Relating To" means constituting, defining, describing, discussing, involving, concerning, containing, evidencing, embodying, reflecting, identifying, stating, analyzing, mentioning, responding to, referring to, dealing with, commenting upon, or in any way pertaining to.
6. "You," or "Your" refers to the Defendant to whom this production request is tendered and his/its attorneys, including any agent, officer, director, employee or representative or any merged, consolidated or acquired predecessor or successor, parent, subsidiary, division, affiliate, controlling stockholder, or any person acting on your behalf.

#### **REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Any and all documents including but not limited to correspondence and executed contracts reflecting the terms of any and all agreements between FSC Securities Corporation and Andover Securities Corporation relating to the acquisition by FSC Securities Corporation of any and all property (tangible and intangible) from Andover Securities Corporation at any time.


#### **RESPONSE:**

2. Any and all documents relating to FSC Securities Corporation's acquisition of any and all property (tangible and intangible) from Andover Securities Corporation at any time.

**RESPONSE:**

Respectfully submitted,

KROGER, GARDIS & REGAS, LLP

By:   
Reynolds B. Brissenden, Attorney No. 19989-49  
Attorney for Plaintiff  
James A. Knauer, Receiver

**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 13<sup>th</sup> day of May, 2002:

James W. Riley, Jr., Esq.  
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