

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO: 12-34121 (07)
Complex Litigation Unit

PHILIP J. VON KAHLE, as Conservator of
P&S Associates, General Partnership, and
S&P Associates, General Partnership,

Plaintiffs,

v.

JANET A. HOOKER CHARITABLE
TRUST, et al,

Defendants.

NOTICE OF RE-FILING AFFIDAVIT OF JULIANNE M. JONES
TO CORRECT CASE CAPTION

Defendant, JULIANNE M. JONES (properly known as JULIANNE MATARAGAS),
hereby re-files her previously-filed Affidavit, and states:

1. Defendant's Affidavit was previously filed on July 21, 2014 under Filing #16132557.
2. The Clerk's Office notified undersigned counsel that the Affidavit needed to be corrected due to an incorrect case caption.
3. Therefore, a copy of the Affidavit is attached hereto as Exhibit "A" and re-submitted under this Notice of Filing.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-filing to Leonard K. Samuels, Esq., Etan Mark, Esq., Steven D. Weber, Esq., at Berger Singerman LLP, 350 East Las Olas Boulevard, Suite 1000, Fort Lauderdale, FL 33301, lsamuels@bergersingerman.com, emark@bergersingerman.com, sweber@bergersingerman.com, this 30th day of July, 2014.

TRIPP SCOTT, P.A.
Counsel for Defendant
JULIANNE MATARAGAS JONES
110 SE 6th, St, 15th Fl.
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By: s/Peter G. Herman
Peter G. Herman
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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO: 12-34121 (07)
Complex Litigation Unit

P&S ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited
partnership; S&P ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership; Phil von Kahle as
Conservator of P&S ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership; and S&P
ASSOCIATES, GENERAL
PARTNERSHIP, a Florida limited
partnership,

Plaintiffs,

v.

JANET A. HOOKER CHARITABLE
TRUST, a charitable trust; DIANE M.
DEN BLEYKER, an individual; ETOH
LTD., a Florida limited partnership;
ERSICA P. GIANNA, an individual and
as Trustee; CATHERINE B. AND BERRY C.
SMITH, individuals; EDNA A. PROFE
REV. LIV. TRUST; HERBERT IRWIG
REVOCABLE TRUST; EDITH ROSEN,
an individual; RICHARD F. AND BETTE
WEST, individuals; GREGG WALLICK,
an individual; JAMES AND VALERIA
BRUCE JUDD, individuals; JULIANNE
M. JONES, an individual; JESSE A. AND
LOIS GOSS, Trustees; LISA RYAN, an
individual; GERTRUDE GORDON, an
individual; SAM ROSEN, an individual;
PARAGON VENTURES, LTD., an
Austrian limited partnership; HOLY
GHOST FATHERS INTERNATIONAL
FUND #2, a Tax-exempt Organization;
SUSAN E. MOLCHAN OR THOMAS A.
WHITEMAN, individuals; JANET B.

MOLCHAN TRUST DTD 5/19/94;
 ROBERT A. UCHIN REV TRUST;
 HOLY GHOST FATHERS,
 COMPASSION FUND, a Tax-exempt
 Organization; HOLY GHOST FATHERS
 HG-MOMBASA, a Tax-exempt
 Organization; HOLY GHOST FATHERS
 INTERNATIONAL FUND #1, a Tax-
 exempt Organization; HOLY GHOST
 FATHERS HG-IRELAND/KENEMA, a
 Tax-exempt Organization;
 CONGRAGATION OF THE HOLY
 GHOST-WESTERN PROVIDENCE, a
 Tax-exempt Organization; ABRAHAM
 OR RITA NEWMAN, individual; JOHN
 J. CROWLEY, and/or JONATHAN
 CROWLEY, individuals; and ALEX E.
 MOLCHAN TRUST DTD 5/19/94;

Defendants.

AFFIDAVIT OF DEFENDANT JULIANNE MATARAGAS JONES

STATE OF NEW YORK

COUNTY OF SUFFOLK

BEFORE ME, the undersigned authority, personally appeared JULIANNE MATARAGAS JONES, who, after being by me duly sworn on oath, deposes and states:

1. My name is JULIANNE MATARAGAS JONES and I am over 18 years of age.
2. I make this Affidavit on personal knowledge of the facts herein.
3. In or about August of 1993, my mother, Theresa Mataragas, became an investor in S&P Associates, General Partnership.

"A"

4. In or about August of 2002, unbeknownst to me, my mother named me and my sister, Geraldine Valicenti, as beneficiaries of her S&P account.
5. My mother took and used all of her interest and for herself and to pay her bills. I received none of that money, and it was gone long before my sister and I inherited this account.
6. Once this account became joint among my mother, sister and me in August 2002, I did not sign a single check that was disbursed. In fact, as mentioned above, I had absolutely no knowledge that my name was even on the account before my mother's death in 2004. The first time I became aware that I was on the account was when my sister and I became joint holders in February 2005.
7. I never sought out an investment in S&P Associates; I inherited the account.
8. On February 16, 2005, my sister wrote a letter (attached as "Exhibit A"), advising S & P of my mother's death. She stated that she knew nothing about the company, and asked to be sent specific information. On at least two occasions, S & P did not send us the partnership agreement or any other information, telling her she should have the partnership agreement already. They kept saying "you should have everything already".
9. My sister and I shared disbursements of \$11,044 before my sister got out of the fund on June 30, 2006.
10. On or about May 1, 2006, I invested into S&P approximately \$110,000 which was from the sale of a house.
11. The letter dissolving my interest in the partnership came approximately one year later -- not long enough for my \$110,000 investment to have earned very much.

12. On October 23, 2007, I wrote a letter to S&P requesting that my membership in the partnership be dissolved and requesting redemption of the total balance in my account (attached as "Exhibit B").

FURTHER AFFIANT SAYETH NAUGHT.

Julianne Mataragas
JULIANNE MATARAGAS

SWORN TO and subscribed before me this 21 day of July, 2014.

Maliha Mahmud
Notary Public

[NOTARY STAMP] Maliha Mahmud
Notary Public - State of New York
No.01MA6268331
Qualified in Suffolk County
My Commission Expires 04-04-2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-filing to Leonard K. Samuels, Esq., Etan Mark, Esq., Steven D. Weber, Esq., at Berger Singerman LLP, 350 East Las Olas Boulevard, Suite 1000, Fort Lauderdale, FL 33301, lsamuels@bergersingerman.com, emark@bergersingerman.com, sweber@bergersingerman.com, this 21 day of July, 2014.

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Counsel for Defendant
JULIANNE MATARAGAS JONES
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By: s/Peter G. Herman
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Geraldine Valicenti
1825 Southeast Deming Avenue
Port St. Lucie, Florida 34952
(772) 335-2234 (Home)
(772) 335-2666 (Fax)
(772) 370-0547 (Cell)

February 16, 2005

S & P Associates, General Partnership
C/o Sullivan & Powell
Port Royale Financial Center
6550 North Federal Highway
Suite 210
Ft. Lauderdale, FL 33308

To Dear Sir or Madam:

This letter is in reference to the account of Theresa Mataragas, SSN [REDACTED] [REDACTED]. My mother passed away on August 25, 2004 and I would like to have her name removed, leaving my name, Geraldine Valicenti and my sister's name, Julianne Mataragas-Jones listed as equal owners of the account. You can use my Social Security number which is [REDACTED]. I have enclosed a letter from my sister agreeing to this change.

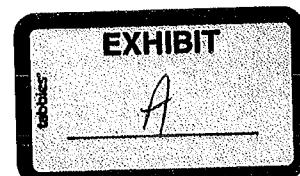
Also, I would appreciate your answers to the following questions.
We inherited this account and know nothing about it. Would you be kind enough to send us some literature about your company and information about our type of account?
Will we be able to invest additional funds into this account and how would we go about it?

If there is any additional information needed in this matter you can contact me at any of the numbers listed above.

Sincerely,

Geraldine Valicenti

Geraldine Valicenti



Julianne Mataragas Jones
42 Mechanic Street
Huntington, NY 11743

S & P Associates, General Partnership
c/o Sullivan and Powell
Port Royale Financial Center
6550 North Federal Highway
Suite 210
Fort Lauderdale, FL 33308
Re: SS **REDACTED**

October 23, 2007

Dear Sir and Madam,

I am writing to tell you that I want to dissolve my membership in the partnership and redeem the total balance of the money in my account.

I recently received my Activity/Status Report for the period 1/1/07 to 9/30/07 and my ending balance was \$231,086.42.

I have found an apartment that I want to buy and will be using these funds for the down payment.

Please let me know, as soon as you can, what the balance of my account is and what I will be receiving.

I can be reached at home at 631-223-3495 but I am at work during the day. My cell phone number is 718-757-4344 and you can write to me at closecall2@gmail.com.

I request that any check you write me be in my maiden name, Julianne Mataragas, if this is possible, since this is my legal name.

Thank you very much for all your consideration.

Very Truly Yours,

Julianne Mataragas Jones
Julianne Mataragas Jones

