

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

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

IN THE CIRCUIT COURT FOR THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY,
FLORIDA

Case No. 12-034123 (07)

Complex Litigation Unit

**PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS
TO DEFENDANT STEVEN F. JACOB**

Plaintiffs, P&S Associates, General Partnership ("P&S"), S&P Associates, General Partnership ("S&P") and Philip Von Kahle as Conservator on behalf of P&S and S&P ("Conservator") (collectively and individually referred to as, the "Partnerships" or "Plaintiffs"), pursuant to Florida Rule of Civil Procedure 1.370, requests that Defendant Steven Jacob ("Jacob" or "You") admit or deny the following:

1. Between 2002 and 2009, Michael D. Sullivan caused You to receive over \$600,000.00 that previously came from S&P and/or P&S.

Response:

2. Between 2002 and 2009, You received over \$600,000.00 that previously came from S&P and/or P&S.

Response:

3. Between 2002 and 2009, You received over \$600,000.00 in commissions that previously came from S&P and/or P&S.

Response:

4. Between 2002 and 2009, Guardian Angel Trust, LLC received over \$600,000.00 from Michael D. Sullivan & Associates.

Response:

5. Between 2002 and 2009, You received over \$600,000.00 from Guardian Angel Trust, LLC.

Response

6. After December 11, 2008, You caused documents related to Guardian Angel Trust, LLC to be destroyed.

Response:

7. After 2012, You caused documents related to Guardian Angel Trust, LLC to be destroyed.

Response:

8. After December 11, 2008 You caused documents related to SPJ Investments, Ltd to be destroyed.

Response:

9. After 2012, You caused documents related to SPJ Investments, Ltd to be destroyed.

Response:

10. Between 2002 and 2009, Michael D. Sullivan caused You to receive money in exchange for Your referral of investors to the Partnerships.

Response:

Dated: August 11, 2015

BERGER SINGERMANN LLP

Attorneys for Plaintiffs

350 East Las Olas Blvd, Suite 1000

Fort Lauderdale, FL 33301

Telephone: (954) 525-9900

Direct: (954) 712-5138

Facsimile: (954) 523-2872

By: s/LEONARD K. SAMUELS

Leonard K. Samuels

Florida Bar No. 501610

Steven D. Weber

Florida Bar No. 47543

And

MESSANA, P.A.

Attorneys for Plaintiffs

401 East Las Olas Boulevard, Suite 1400

Ft. Lauderdale, FL 33301

Telephone: (954) 712-7400

Facsimile: (954) 712-7401

By: /s/ Thomas M. Messana

Thomas M. Messana, Esq.

Florida Bar No. 991422

Thomas G. Zeichman

Florida Bar No. 99239

ACKNOWLEDGEMENT

By: _____
Title: _____

STATE OF)
) SS:
COUNTY OF)

BEFORE ME, the undersigned authority, personally appeared _____ as _____ of Defendant Steven Jacob who, being first duly sworn, deposes and states that the answers to the foregoing Interrogatories are true and correct.

SWORN TO AND SUBSCRIBED before me, this _____ day of _____, 2015, by _____, who is _____ personally known to me or _____ has produced _____ as identification.

Notary Public, State of
Commission No.

My Commission Expires: