

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

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

Case No. 12-034123 (07)  
Complex Litigation Unit

Plaintiffs,

vs.

MICHAEL D. SULLIVAN, et al.,

Defendants.

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**DEFENDANT STEVEN F. JACOB'S**  
**REQUEST FOR ADMISSIONS TO PLAINTIFF**

Defendant, STEVEN F. JACOB, by and through his undersigned counsel, serves this Request for Admissions upon Plaintiff, Philip J. Von Kahle, as Conservator of P&S Associates, General Partnership and S&P Associates, General Partnership, and request that Plaintiff admit or deny each request in writing, within thirty (30) days of service herein, in accordance with the Florida Rules of Civil Procedure.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of October, 2015, the foregoing document is being e-served on all counsel of record on the attached service list.

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## REQUEST FOR ADMISSIONS

1. Admit or deny that the partnership agreements allowed for 20% of profits to be paid to the managing General Partner.
2. Admit or deny that Michael D. Sullivan, and/or entities controlled by him, was a Managing General Partner of the Partnerships through 2010.
3. Admit or deny that Guardian Angel Trust, LLC, was an investor in the Partnerships.
4. Admit or deny that neither Jacob nor Steve F. Jacob, CPA received any monies directly from the Partnerships prior to December 11, 2008.
5. Admit or deny that neither Jacob nor Steve F. Jacob, CPA was ever retained, performed accounting services, or in any way presented himself as the CPA for the partnerships.
6. Admit or deny that after it was discovered that the Partnerships had invested in the Madoff Ponzi Scheme and lost its investment, a review of Partnerships records showed there was no money missing from the Partnership records.
7. Admit or deny that there is no evidence nor belief that Michael D. Sullivan ran the Partnerships as a Ponzi Scheme.
8. Admit or deny that there is no evidence or belief that Michael D. Sullivan had knowledge of Madoff's fraud prior to it becoming public knowledge and that Guardian Angel Trust, LLC was a pass through entity that only held any assets short term.