

LAW OFFICES OF  
**SIRIANNI & YOUTZ**



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AZ CORP COMMISSION  
April 27, 1998  
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ARIZONA CORPORATION COMMISSION  
Attn: Docket Control Center  
1200 West Washington, Suite 208,  
Phoenix, Arizona 85007

DOCUMENT CONTROL

**RE: *Forex Investment Services Corporation, etc., et al.***  
**S-03177A-98-0000**

Dear Sir or Madam:

Enclosed are the following pleadings:

1. (a) Docket Control Center Cover Sheet (original plus one return copy);  
(b) Respondents' Objection to Notice of Deposition and Request for Documents of Records of Respondent Eastern Vanguard Forex Ltd. (original plus 10 filing copies, and one return copy);
2. (a) Docket Control Center Cover Sheet (original plus one return copy);  
(b) Respondents' Objection to Notice of Deposition and Request for Documents to the Custodian of Records of Respondent Eastern Vanguard Group Ltd. (original plus 10 filing copies, and one return copy);
3. (a) Docket Control Center Cover Sheet (original plus one return copy);  
(b) Respondents' Objection to Notice of Deposition and Request for Documents to the Custodian of Records of Respondent Y & T Inc. dba Tokyo International Investment Ltd. (original plus 10 filing copies, and one return copy);
4. (a) Docket Control Center Cover Sheet (original plus one return copy);  
(b) Respondents' Objection to Notice of Deposition and Request for Documents to Respondent To Fai Cheng (original plus 10 filing copies, and one return copy);
5. (a) Docket Control Center Cover Sheet (original plus one return copy).  
(b) Respondents' Objection to Notice of Deposition and Request for Documents to the Custodian of Records of Respondent Jean Yuen (original plus 10 filing copies, and one return copy);

**SIRIANNI & YOUTZ**

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Please file the originals and copies, and return one endorsed-filed copy of each pleading to the undersigned in the enclosed, self-addressed stamped envelope. Thank you.

Very truly yours,

SIRIANNI & YOUTZ



Chris R. Youtz

CRY:bd

Enclosures



- 1 PETER SUEN SUK TAK )
- 2 Eastern Vanguard Group Limited )
- 3 Creque Building, Main Street, P.O. Box 116 )
- 4 Road Town, Tortola )
- 5 British Virgin Islands )
- 6 JAMES CHARLES SIMMONS, JR. )
- 7 5045 N. 58th Ave., #23A )
- 8 Glendale, AZ 85301 )
- 9 MICHAEL E. CHO )
- 10 839 Faxon Avenue )
- 11 San Francisco, CA 94112 )
- 12 TO FAI CHENG )
- 13 1800 Van Ness, 2nd Fl. )
- 14 San Francisco, CA 94109 )
- 15 JEAN YUEN )
- 16 439 - 3rd Avenue )
- 17 San Francisco, CA 94118 )
- 18 Y & T INC., dba TOKYO INTERNATIONAL )
- 19 INVESTMENT LTD. )
- 20 1800 Van Ness Ave., 2nd Fl. )
- 21 San Francisco, CA 94109 )
- 22 WING MING TAM )
- 23 c/o Tokyo International Investment Ltd. )
- 24 1800 Van Ness Ave., 2nd Fl. )
- 25 San Francisco, CA 94109 )
- 26 GUO QUAN ZHANG )
- c/o Tokyo International Investment Ltd. )
- 1800 Van Ness Ave., 2nd Fl. )
- San Francisco, CA 94109 )

**Respondents.**

26 OBJECTION TO NOTICE OF DEPOSITION AND  
 REQUEST FOR DOCUMENTS TO THE CUSTODIAN  
 OF RECORDS OF RESPONDENT EASTERN  
 VANGUARD GROUP LTD. - 2

**SIRIANNI & YOUTZ**  
 3410 COLUMBIA CENTER  
 701 FIFTH AVENUE  
 SEATTLE, WASHINGTON 98104-7032  
 (206) 223-0303

1 Respondent EASTERN VANGUARD GROUP LTD. hereby objects to the  
2 Notice of Deposition and Request for Documents directed to the Custodian of Records for  
3 EASTERN VANGUARD GROUP LTD., for the following reasons:

4 1. The respondent is not obligated to produce the documents for  
5 lack of personal jurisdiction.

6 2. The respondent is not obligated to produce the documents  
7 because the securities division does not have subject matter jurisdiction over this  
8 matter.

9 3. The requests are overly broad and call for information that is  
10 neither relevant nor likely to lead to admissible evidence.

11 4. Request C is vague and ambiguous.

12 5. Insufficient time has been provided to respond to these requests.

13 6. Many of the documents requested have been previously  
14 produced, and this demand is unduly burdensome.

15 DATED: April 27, 1998.

16 SIRIANNI & YOUTZ

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19 Chris R. Youtz (WSBA #7786)  
20 Attorneys for Respondents

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DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington and the United States, that on April 27, 1998, I caused a copy of this document, together with its corresponding Arizona Corporation Commission Docket Control Center Cover Sheet, to be served upon attorneys for the Arizona Corporation Commission by facsimile & First Class Mail, addressed as follows:

Mark C. Knops, Senior Counsel  
ARIZONA CORPORATION COMMISSION  
Securities Division  
1300 West Washington, Third Floor  
Phoenix, AZ 85007-2996  
Phone: (602) 542-4242  
Fax No.: (602) 594-7470

On April 27, 1998 I also mailed the original and ten copies of this document, together with one original of its corresponding ACC Docket Control Center Cover Sheet, to the Arizona Corporations Commission, addressed as follows:

ARIZONA CORPORATION COMMISSION  
Attn: Docket Control Center  
1200 West Washington, Suite 208,  
Phoenix, Arizona 85007  
Phone: (602)542-3477

Signed on April 27, 1998, at Seattle, WA

  
Bonnie Deblinger