

- 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.**)

23 Respondent TO FAI CHENG hereby objects to the Notice of Deposition and
 24 Request for Documents directed to TO FAI CHENG, for the following reasons:

26 OBJECTION TO NOTICE OF DEPOSITION AND
 REQUEST FOR DOCUMENTS TO TO FAI CHENG -2

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

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

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

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

4. Request 10 is vague and ambiguous.

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

DATED: April 27, 1998.

SIRIANNI & YOUTZ


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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

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, 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