



BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION

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JIM IRVIN
Commissioner-Chairman
RENZ D. JENNINGS
Commissioner
CARL J. KUNASEK
Commissioner

In the matter of:

FOREX INVESTMENT SERVICES CORPORATION
2700 N. Central Ave., Suite 1110
Phoenix, AZ 85004

EASTERN VANGUARD FOREX LTD.
2700 N. Central Ave., Suite 1110
Phoenix, AZ 85004

c/o HWR Services Limited, Registered Agent
P. O. Box 71, Craigmuir Chambers
Road Town, Tortola
British Virgin Islands

EASTERN VANGUARD GROUP LIMITED
c/o AMS Trustees Limited, Registered Agent
Creque Building, Main Street, P. O. Box 116
Road Town, Tortola
British Virgin Islands

K. (DAVID) SHARMA
Eastern Vanguard Forex Ltd.
P. O. Box 71, Craigmuir Chambers
Road Town, Tortola
British Virgin Islands

SAMMY LEE CHUN WING
Eastern Vanguard Group Limited
Creque Building, Main Street, P. O. Box 116
Road Town, Tortola
British Virgin Islands

PETER SUEN SUK TAK
Eastern Vanguard Group Limited
Creque Building, Main Street, P. O. Box 116
Road Town, Tortola
British Virgin Islands

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DOCKET NO. S-03177A-98-0000

**NOTICE OF DEPOSITION AND
REQUEST FOR DOCUMENTS**

~~Arizona~~ Corporation Commission
DOCKETED

APR 10 1998

DOCKETED BY *tmb*

- 1 JAMES CHARLES SIMMONS, JR.)
- 2 5045 N. 58th Ave. #23A)
- 3 Glendale, AZ 85301)
- 4 MICHAEL E. CHO)
- 5 839 Faxon Avenue)
- 6 San Francisco, CA 94112)
- 7 TO FAI CHENG)
- 8 1800 Van Ness, 2nd Fl.)
- 9 San Francisco, CA 94109)
- 10 JEAN YUEN)
- 11 439 3rd Avenue)
- 12 San Francisco, CA 94118)
- 13 Y & T INC. dba TOKYO)
- 14 INTERNATIONAL INVESTMENT LTD.)
- 15 1800 Van Ness Ave., 2nd Fl.)
- 16 San Francisco, CA 94109)
- 17 WING MING TAM)
- 18 c/o Tokyo International Investment Ltd.)
- 19 1800 Van Ness Ave., 2nd Fl.)
- 20 San Francisco, CA 94109)
- 21 GUO QUAN ZHANG)
- 22 c/o Tokyo International Investment Ltd.)
- 23 1800 Van Ness Ave., 2nd Fl.)
- 24 San Francisco, CA 94109)
- 25 **Respondents.**)

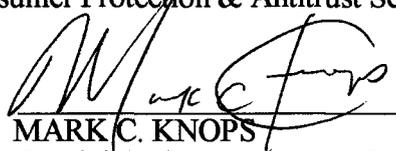
18 NOTICE IS HEREBY GIVEN that, pursuant to A.A.C. R14-3-109(C), the deposition upon
 19 oral examination of the following person will be taken on the date and at the time indicated,
 20 together with their production of the documents listed in attached Exhibit A.

21
 22 PERSON TO BE EXAMINED: Custodian of Records of Eastern Vanguard Forex Ltd.
 23 DATE AND TIME OF DEPOSITION: Monday, April 27, 1998 at 9:30 a.m.
 24
 25 PLACE OF DEPOSITION: Securities Division, Arizona Corporation Commission
 26 1300 West Washington, 3rd Fl.
 Phoenix, AZ 85007

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DATED this 10th day of April, 1998.

GRANT WOODS
Attorney General
Consumer Protection & Antitrust Section


By: MARK C. KNOPS
Special Assistant Attorney General
ROBERT A. ZUMOFF
Assistant Attorney General
Attorneys for the Securities
Division of the Arizona
Corporation Commission

1 **EXHIBIT A**

2 For the period from January 1, 1994 to the present, all books, documents, memoranda and
3 other records, whether stored in hard copy or any electronic, magnetic or other form of information
4 storage, **incident to or relating to:**

5 **A.**

6 The financial relationship and transactions, direct and indirect, between **Eastern Vanguard**
7 **Forex Ltd.**, an British Virgin Islands company (referred to hereafter as "EVFL"), and **Eastern**
8 **Vanguard Group Limited** (referred to hereafter as "EVGL"), including **but not limited to,**

- 9 1. any financial statements or other reports, whether audited or unaudited, with accompanying
10 footnotes and auditor's reports;
11 2. all accounting records and books of original entry, including but not limited to cash receipts
12 journal, cash disbursements journal, sales journal, general journal and subsidiary journals;
13 3. bank documents showing direct or indirect transfers of funds between **EVFL** and **EVGL**.

14 **B.**

15 The financial relationship and transactions, direct and indirect, between **EVFL** and **Forex**
16 **Investment Services Corporation** (referred to hereafter as "FISC"), including **but not limited to,**

- 17 1. any financial statements or other reports, whether audited or unaudited, with accompanying
18 footnotes and auditor's reports;
19 2. all accounting records and books of original entry, including but not limited to cash receipts
20 journal, cash disbursements journal, sales journal, general journal and subsidiary journals;
21 3. bank documents showing direct or indirect transfers of funds between **EVFL** and **FISC**.

22 **C.**

23 The organization, management and ownership of **EVFL**, including **but not limited to,**

- 24 1. names and addresses of all past and present officers, directors and shareholders, as well as
25 the amount of shares in such company presently and/or previously held by each and their dates of
26 issuance;

- 1 2. minutes of all directors and/or shareholders meetings, including resolutions adopted or
- 2 proposed, and all information used or presented at these meetings;
- 3 3. bylaws;
- 4 4. shareholder agreements;
- 5 5. incorporation and other documents filed with governmental agencies that relate to authority
- 6 to conduct business;
- 7 6. amounts and dates of payments or transfers by EVFL to its officers, directors and
- 8 shareholders, whether as salaries, expense reimbursements, dividends or other distribution of
- 9 earnings, gifts, bonuses or other forms of value, whether in the form of currency, property or other
- 10 assets, tangible and intangible;
- 11 7. amounts, dates and terms of all loans by EVFL to its officers, directors and shareholders,
- 12 and the status of such loans.

13 D.

14 Business activities between EVFL and EVGL, or between EVFL and other persons or

15 entities involving or affecting EVGL, including **but not limited to**, contracts, agreements,

16 correspondence, memoranda, reports or other communications.

17 E.

18 Contracts, agreements and related memoranda and correspondence between EVFL and

19 **FISC.**

20 F.

21 Contracts, agreements and related memoranda and correspondence between EVFL and Y

22 **& T Inc. dba Tokyo International Investment Ltd.**, a California corporation.

1 ORIGINAL AND TEN (10) COPIES of the foregoing
2 filed this 10th day of April, 1998, with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 Copy of the foregoing
8 mailed and/or faxed this
9 13th day of April, 1998
10 to:

11 Chris R. Youtz, Esq.
12 Sirianni & Youtz
13 Columbia Center
14 701 Fifth Ave., Ste. 3410
15 Seattle, WA 98104
16 ATTORNEY FOR RESPONDENTS

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By: Michael Robert Hoff