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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS:

Arizona Corporation Commission

DOCKETED

JAN 29 2004

MARC SPITZER, Chairman
JIM IRVIN
WILLIAM A. MUNDELL
JEFF MATCH-MILLER
MIKE GLEASON

DOCKETED BY

In the matter of:

**YUCATAN RESORTS, INC., d/b/a/ YUCATAN
RESORTS, S.A.;**

3222 Mishawaka Avenue
South Bend, IN 46615
P.O. Box 2661
South Bend, IN 46680
Av. Coba #82 Lote 10, 3er Piso
Cancun, Q. Roo
Mexico C.P. 77500

DOCKET NO. S-03539A-03-0000

**RESORT HOLDINGS INTERNATIONAL, INC.,
d/b/a RESORT HOLDINGS INTERNATIONAL,
S.A.;**

3222 Mishawaka Avenue
South Bend, IN 46615
P.O. Box 2661
South Bend, IN 46680
Av. Coba #82 Lote 10, 3er Piso
Cancun, Q. Roo
Mexico C.P. 77500

**RESPONDENTS, YUCATAN RESORTS,
INC., YUCATAN RESORTS, S.A.,
RESORT HOLDINGS INTERNATIONAL,
INC. AND RESORT HOLDINGS
INTERNATIONAL, S.A.'S FIRST SET OF
NON-UNIFORM INTERROGATORIES**

**(ASSIGNED TO ADMINISTRATIVE LAW
JUDGE MARC STERN)**

**WORLD PHANTASY TOURS, INC., a/k/a
MAJESTY TRAVEL, a/k/a VIAJES MAJESTY;**

Calle Eusebio A. Morales
Edificio Atlantida, P Baja
APDO, 8301 Zona 7 Panama

And

MICHAEL E. KELLY and LORI KELLY

husband and wife,
3222 Mishawaka Avenue
South Bend, IN 46615
P.O. Box 2661
South Bend, IN 46680,

Respondents

1 5. **“Division”** means the Arizona Securities Division, including any predecessor agency,
2 the Office of the Division, and the Staff of the Enforcement Unit, Registration and Enforcement
3 Section, or any other section thereof, and its employees, agents and assigns.

4 6. **“Document”** means any and all writings of any kind, including the originals and non-
5 identical copies, whether different from the originals by reason of any notation made on such copies
6 or otherwise, including without limitation, correspondence, memoranda, notes, diaries, statistics,
7 letters, telegrams, minutes, contracts, reports, studies, text, statements, receipts, returns, summaries,
8 pamphlets, books, prospectuses, inter-office and intra-office communications, offers, notations of any
9 sort regarding conversations, telephone calls, meetings or other communications, bulletins, printed
10 matters, computer printouts, teletypes, telefax, invoices, work sheets, and each and every draft,
11 alteration, modification, change or amendment of any kind of the foregoing; graphic or aural records
12 and oral representations of any kind, including without limitation, photographs, charts, graphs,
13 microfiche, microfilm, video tapes, recordings, motion pictures; and electronic, magnetic, mechanical
14 or electric records or representations of any kind, including without limitation, tapes, cassettes, disks,
15 computer generated or stored information and recordings. All documents should be produced without
16 alteration with any and all exhibits and attachments thereto.

17 7. **“Evidence”** or **“Evidencing”** means tending to show, in any probative manner, the
18 existence or nonexistence of any matter.

19 8. **“Identify,”** or **“identity”** when used in reference as a natural person, means state the
20 full name, present or last name, complete residential and business address and the name of the current
21 or last employer; if the person is an entity, state the current name for the entity, its principal home
22 office address and home telephone number, and the name of the natural person with whom most of
23 the communications with such entity are made or the name of the natural person whom the party
24 responding to these interrogatories believes would have personal knowledge regarding the
25 information requested in the interrogatories; **“identify”** or **“identity”** when used in reference to
26 document, means to state the type of document identified, its author and his or her title and position,

1 the dates the document was created, the addressee(s) and their title or position, the person(s) receiving
2 a copy and their title or position, and a general description of the subject matter contained in such
3 document; and "identity" or "identify" as used herein with respect to any communication shall be
4 read to require a statement of all of the following: (a) the date on which the communication occurred;
5 (b) the identity of each person who was present or who participated; and (c) the place at which it
6 occurred or, in the case of a telephone or electric communication, the location of each party.

7 9. "**Kelly**" means Michael E. Kelly, and his employees and agents.

8 10. "**Lori Kelly**" means Lori Kelly, Michael E. Kelly's spouse.

9 11. "**Order**" means the Arizona Securities Division's Temporary Order to Cease and
10 Desist and Notice of Opportunity for Hearing, dated May 20, 2003.

11 12. "**Person**" means all natural persons, male or female, and all types and kinds of
12 business and other entities, including, but not limited to, corporations, partnerships, joint ventures and
13 sole proprietorships.

14 13. "**Proceeding**" refers to all claims, crossclaims, counterclaims, and defenses, whether
15 now asserted or asserted hereafter by amendments, supplement or otherwise, of the parties of the
16 above-styled and numbered administrative proceeding.

17 14. "**Relating**" or "**Relates**" means, in addition to its customary usual meaning,
18 discussing, referring to, pertaining, reflecting, showing or recording.

19 15. "**Resort Holdings**" means Resort Holdings International, Inc., and its officers,
20 directors, employees, and agents.

21 16. "**Resort Holdings, S.A.**" means Resort Holdings International, S.A. and its officers,
22 directors, employees, and agents.

23 17. "**Universal Lease**" means the "Universal Lease Program" specifically referred to in
24 paragraph 11 and generally referred to throughout the Order.

25 18. "**Universal Lease Sales Agent**" means any company or individual that the Division
26 contends has offered and/or sold Universal Leases in or from the State of Arizona.

1 4. Identify and describe each and every expert's or consultant's background, prior
2 testimony, *curriculum vitae* and the like.

3 **RESPONSE:**

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6 5. Identify each and every witness the Division may or intends to call at any hearing
7 in this matter, or to use in any fashion in these proceedings.

8 **RESPONSE:**

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 6. Identify and describe every individual and/or business the Division intends to
subject to an Examination Under Oath ("EUO").

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RESPONSE:

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 7. Identify and describe every individual and/or business who has lodged a complaint
(in any form) to the Division about any of the Respondents or the Universal Lease.

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RESPONSE:

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 8. Identify and describe each and every person or business the Division has spoken
with, interviewed, obtained a statement, affidavit, documents, and/or declarations from, and
identify and describe each and every one of the documents.

24

RESPONSE:

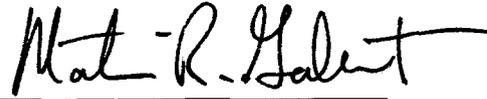
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RESPECTFULLY SUBMITTED,

GALBUT & HUNTER
A Professional Corporation



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**Attorneys for Respondents Yucatan Resorts, S.A.,
Yucatan Resorts, Inc., Resort Holdings
International, S.A., Resort Holdings International,
Inc.**

ORIGINAL and thirteen copies of the foregoing
hand-delivered this 29th day of January, 2004 to:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered
this 29th day of January, 2004 to:

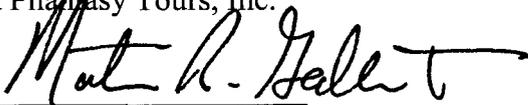
Marc Stern, Esq.
Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

1 Jaime Palfai, Esq.
2 W. Mark Sendrow, Esq.
3 Securities Division
4 Arizona Corporation Commission
5 1300 West Washington Street, 3rd Floor
6 Phoenix, Arizona 85007

7 COPY of the foregoing sent *via* U.S. Mail or e-mail
8 this 29th day of January, 2004 to:

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22 World Fantasy Tours, Inc.

23
24 By: 
25 Martin R. Galbut, Esq.
26