

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

IN RE:

Case No. 16-20516-AJC  
Chapter 7  
(Jointly Administered)

PROVIDENCE FINANCIAL  
INVESTMENTS, INC.,  
PROVIDENCE FIXED INCOME  
FUND, LLC.,

Case No. 16-20517-AJC

Debtors.

NOTICE OF RULE 2004 EXAMINATION DUCES TECUM  
(DOCUMENTS ONLY)

\_\_\_\_\_ /

Maria Yip, the Chapter 7 Trustee (the "Trustee"), for the jointly administered estates of Providence Financial Investments, Inc. and Providence Fixed Income Fund, LLC (the "Debtors"), by and through undersigned counsel, requests that **Jeffrey Watts** produce and deliver on or before **4:30 p.m., Tuesday, October 18, 2016**, to Catherine E. Douglas, Esq. at the law offices of Akerman LLP, Las Olas Centre II, 350 East Las Olas Boulevard, Suite 1600, Fort Lauderdale, Florida 33301, all of the documents as detailed in the Subpoena for Rule 2004 Examination included with this Notice, attached hereto and incorporated herein.

This request for production of documents is pursuant to Rule 2004, *Federal Rules of Bankruptcy Procedure*, and Local Rule 2004-1, *Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of Florida*. The scope of the request is as described in Bankruptcy Rule 2004. Pursuant to Local Rule 2004-1 no order shall be necessary.

Dated: October 5, 2016

Respectfully submitted,

**AKERMAN LLP**

Las Olas Centre II, Suite 1600  
350 East Las Olas Boulevard  
Fort Lauderdale, Florida 33301  
Telephone: 954-463-2700  
Facsimile: 954-463-2224

By: /s/ Catherine E. Douglas

Catherine E. Douglas, Esq.

Florida Bar Number: 85843

Email: [catherine.douglas@akerman.com](mailto:catherine.douglas@akerman.com)

*Counsel for Trustee*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via e-mail and/or U.S. Mail, on October 5, 2016 to all parties as reflected on the attached Service List.

By: /s/ Catherine E. Douglas

Catherine E. Douglas, Esq.

**SERVICE LIST**

**16-20516-AJC and 16-20517-AJC Notice will be electronically mailed to:**

Eyal Berger, Esq. on behalf of Trustee Maria Yip  
eyal.berger@akerman.com, jeanette.martinez@akerman.com

Richard J Cole on behalf of Creditor Violetta Lvov  
rcole3@gmail.com, rc3@colecolelaw.com

Catherine E Douglas on behalf of Trustee Maria Yip  
catherine.douglas@akerman.com, jeanette.martinez@akerman.com

James D Gassenheimer on behalf of Trustee Maria Yip  
jgassenheimer@bergersingerman.com, efile@bergersingerman.com;efile@ecf.inforuptcy.com

Joan M Levit, Esq on behalf of Trustee Maria Yip  
joan.levit@akerman.com, charlene.cerda@akerman.com

James B Miller, Esq on behalf of Debtor Providence Financial Investments, Inc.  
bkcmiami@gmail.com

Office of the US Trustee  
USTPRegion21.MM.ECF@usdoj.gov

Susan R Sherrill-Beard, Esq on behalf of Creditor U.S. Securities and Exchange Commission  
sherrill-beards@sec.gov, atltreorg@sec.gov;berlina@sec.gov;martinc@sec.gov

Maria Yip  
trustee@yipcpa.com, myip@ecf.epiqsystems.com

Maria Yip on behalf of Trustee Maria Yip  
trustee@yipcpa.com, myip@ecf.epiqsystems.com

**Via U.S. Mail:**

Lawrence Buskee  
4862 School St #1130  
Acworth, GA 30101

Julie H Firestone  
Briggs and Morgan, PA  
2200 IDS Center  
80 South 8 Street  
Minneapolis, MN 55402

Providence Holdings International, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Global Social Technologies Corp.  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

BPA Associates Investment & Trading  
Company, Inc.  
5300 NW 33 Ave., #117  
Fort Lauderdale, FL 33309

Providence Asia Finance & Trading Corp.  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

Providence Growth Fund LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Global, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Trade International Corporation  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

International Monetary Mortgage Fund, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Partners International, LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

PFI Global Corp.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

New Horizon Financial Corporation  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

The Providence Companies LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

PFIF, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Capital Ventures, LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

BPA Technology, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Financial Investments  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Health Corporation  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

BPA Sourcing, Inc.  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

Providence Partners, LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Entertainment & Media, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Siente Y Vive International Foundation  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

BPA Holdings, Inc.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Worldwide Travel Corp.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Management Services, LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Private Markets Corp.  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Motors & Equipment  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

PLP Capital Partners LLC  
c/o Jose M. Ordonez Jr., Registered Agent  
3050 SW 139 Terrace  
Davie, FL 33330

Providence Preferred Corp.  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

Providence Realty Advisors, LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Management & Development  
LLC  
2020 Ponce de Leon Blvd., #901  
Coral Gables, FL 33134

Providence Strategic Ventures Fund LLC  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

All American Quality Corporation  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

Browning Productions & Entertainment  
c/o William J. Browning, Registered Agent  
1792 Bell Tower Lane  
Weston, FL 33326

Training Grounds TV, LLC  
c/o William J. Browning, Registered Agent  
1792 Bell Tower Lane  
Weston, FL 33326

Americas Crowdfunding, LLC  
c/o William J. Browning, Registered Agent  
1792 Bell Tower Lane  
Weston, FL 33326

BS Settlements, Inc.  
c/o Corporation Trust Company, RA  
Corporation Trust Center  
1209 Orange St.  
Wilmington, DE 19801

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

IN RE:  
  
PROVIDENCE FINANCIAL  
INVESTMENTS, INC.,  
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FUND, LLC.,

Case No. 16-20516-AJC  
Chapter 7  
(Jointly Administered)

Case No. 16-20517-AJC

Debtors.

**SUBPOENA FOR RULE 2004 EXAMINATION  
(DUCES TECUM)**

To: **MR. JEFFREY WATTS**  
c/o **LILLY ANN SANCHEZ** (via e-mail and Federal Express)  
**THE LS LAW FIRM**  
**FOUR SEASONS TOWER, SUITE 1200**  
**1441 BRICKELL AVE**  
**MIAMI, FL 33131-3439**

YOU ARE COMMANDED to appear and testify at an examination at the place, date, and time specified below.

PLACE OF TESTIMONY	DATE AND TIME
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The examination will be recorded by this method: N/A.

**Production:** You, or your representatives, must also bring with you to the examination the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: **PLEASE SEE ATTACHED SCHEDULE "A".**

PLACE	DATE AND TIME
<b>AKERMAN LLP</b> <b>350 East Las Olas Blvd., 16<sup>th</sup> Floor, Ft. Laud., FL 33301</b>	<b>Tuesday, October 18, 2016 by 4:30 p.m.</b>

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

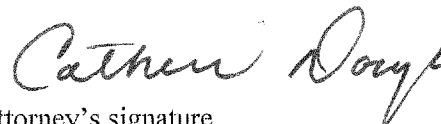
Date: 10/4/16

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR

Attorney's signature



The name, address, email address, and telephone number of the attorney representing Maria Yip, Trustee, who issues or requests **Catherine E. Douglas, Esq., Akerman, LLP, 350 E. Las Olas Blvd., Suite 1600, Ft. Laud., FL 33301, Phone: 954-463-2700**

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for (name of individual and title, if any): \_\_\_\_\_  
on (date) \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on (date) \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_.

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Server's signature

\_\_\_\_\_  
Printed name and title

\_\_\_\_\_  
Server's address

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.* The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**For Access to Subpoena Materials**

Fed. R. Civ. P. 45(a) Committee Note (2013)

- Parties desiring access to information produced in response to this subpoena will need to follow up with the party serving the subpoena to obtain such access.
- The party serving the subpoena should make reasonable provisions for prompt access.
- The court for the district where compliance with the subpoena is required has authority to order notice of receipt of produced materials or access to them.



**SCHEDULE "A"**

**DEFINITIONS**

1. "Affiliates" shall mean any individual and/or entity listed in Table "A" attached hereto.

2. "Bankruptcy Code" means title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.*

3. "Buzaneli" means Antonio Buzaneli.

4. The term "claim" shall have the meaning ascribed to in section 101(5) of the Bankruptcy Code.

5. The term "communication" includes the transmittal of information (in the form of facts, ideas, opinions, inquiries or otherwise).

6. The term "concerning" includes referring to, responding to, connected with, supporting, memorializing, regarding, discussing, analyzing, evidencing, showing, depicting, describing, reflecting, implying and/or constituting.

7. The term "control" means in your possession, custody, or control or under your direction, and includes in the possession, custody or control of those under the direction of you or your parents, affiliates, subsidiaries, officers, directors, shareholders, members, employees, servants, agents, representatives, attorneys, investigators and any person or entity acting or who has acted by or on their behalf.

8. The term "Debtors" shall collectively mean Providence Financial Investments, Inc., and Providence Fixed Income Fund, including any of their predecessors, affiliates, assigns, employees, agents, and others purporting to act on its behalf as filed in the United States Bankruptcy Court, Southern District of Florida, Case No. 16-20516-AJC.

9. The term "debt" shall have the meaning ascribed to it in section 101(12) of the Bankruptcy Code.

10. The term "describe" means to: (i) provide a narrative statement concerning the matter in question; (ii) identify all persons having knowledge thereof, stating the subject matter of each and every such person's knowledge and the manner in which his knowledge was obtained; (iii) identify all document and other communications concerning the matter in question; and (iv) state what acts were performed or omitted by each and every person who in any way participated in the matter in question.

11. The term "document" has the broadest meaning accorded to it by the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, and includes without limitation all written, typed, printed, reproduced, filmed, stored, or recorded material of any kind, in the possession, custody, or control of you or any of your past or present agents, employees, consultants, attorneys or other persons acting on your behalf, including but not limited to any of the following: correspondence; letters; memoranda; interoffice memoranda; writings; notes; notebooks; charts; electronic mail; studies; plans; analyses; work papers; statistical records; bills and other billing records; receipts; books; press releases; reports; contracts and agreements; records, summaries, memorializations, minutes, agendas or notes of meetings, conferences, telephone calls, or other conversations; calendars and diaries; appointment books and message pads; photographs; tape recordings or other audio or video records; handwritten notes or notations in any form; computer tapes, disks, and other data compilations from which information can be obtained, including, without limitation, electronic or computerized data compilations (including electronic mail), electronic bookkeeping and accounting records

(including QuickBooks files), and any printouts thereof; attachments and enclosures; and any drafts of the foregoing.

12. The term "draft" means any earlier, preliminary, preparatory, or tentative version of all or part of a document, whether or not such draft was superseded by a later draft and whether or not the terms of the draft are the same as or different from the terms of the final document.

13. "All documents" means every document or group of documents as above defined that are known to you or that can be located or discovered by reasonably diligent search.

14. The term "Examinee" means Jeffrey Watts.

15. When referring to documents and other communications, the term "identify" with respect to a person will mean you will furnish information sufficient to enable the Debtors to locate such person, and

a. if the person is a natural person, provide his or her name, present or last known address, phone numbers and facsimile numbers, current and former relevant employer, similar identifying information for identified employers, and present and former relevant positions held at the above respective places of employment;

b. if the person is not a natural person, state whether such entity is a corporation, partnership or other organization, its name, present or last known address, phone number, and similar identifying information.

16. The term "including" means including but not limited to.

17. "Maria Yip" shall mean the Chapter 7 Trustee for the estate of Providence Financial Investments, Inc. (the "Debtor" as referenced above) and Providence Fixed Income

Fund, LLC as filed in the United States Bankruptcy Court, Southern District of Florida, Case No. 16-20517-AJC.

18. "Ordonez" means Jose Ordonez.

19. The term "person" means an individual, a corporation, a general partnership, a limited partnership, a limited liability company, limited liability partnership, an association, a trust or any other entity or organization, including a government or political subdivision or an agency or instrumentality thereof, and the agents, servants, and employees of same.

20. "Rivera" means Julio Rivera.

21. The term "transfer" shall have the meaning provided in the Bankruptcy Code in section 101(54), and shall include within its definition the creation of a lien, the retention of title as a security interest, the foreclosure of a counterparty's equity of redemption, or each mode, direct or indirect, absolute or conditional, voluntary or involuntary, of disposing of or parting with property or an interest in property.

22. "You" and/or "Your" means Examinee and any agent or other third party acting on his behalf.

**INSTRUCTIONS**

1. Unless otherwise indicated, the applicable time period for these requests is from January 1, 2009 through and including the date of your response.

2. These requests are continuing in nature, so as to require supplemental responses if you obtain or discover further, contradictory or different documents subsequent to the date of your production. Such supplemental responses, if any, shall be filed from time to time promptly upon the discovery by you of such supplemental documents. Each request is to be responded to separately and as completely as possible. The fact that an investigation is continuing and discovery is not complete shall not be used as a reason for failure to respond to any such request as fully as possible. The omission of any document or other item of information from the response shall be deemed a representation that such document or item is not known to the Examinee, its counsel, and/or other representatives or agents of the Examinee.

3. Produce not only those documents in your possession, custody or control, but also those documents in the possession, custody or control of any of your parents, affiliates, subsidiaries, officers, directors, shareholders, members, employees, servants, agents, representatives, attorneys, investigators and any person or entity now acting or who has ever acted by or on your behalf.

4. In responding to these document requests, you are required to obtain and furnish all information available to you and any of your employees, agents, representatives, or attorneys and to obtain and furnish all documents, written and/or electronic, that are in your possession or under your control, or in the possession or under the, control of any of your employees, agents, representatives, and/or attorneys.

5. If any privilege is asserted as to any document required to be produced hereby:

- (a) identify each such document by stating (i) the type of document, (ii) its general subject matter, (iii) the date of the document, and (iv) the identity of each person who prepared, signed or participated in the preparation of the document, as well as each addressee and recipient;
- (b) state the precise nature of the privileged claimed;
- (c) state the basis for the privilege claimed relative to the specific information contained in the document; and
- (d) state all facts contained within the document, deleting only opinions, theories, mental impressions and non-factual statements.

6. If any document was, but is no longer, in Your possession, custody or control, provide the following information:

- (a) identify the document;
- (b) state the disposition of the document and the date such disposition was made;
- (c) identify the present custodian of the document and state his address or, if the document no longer exists, so state; and
- (d) identify the person who made the decision regarding the disposition of the document.

7. All documents that exist in electronic format shall be produced in the format in which they are maintained, including all meta-data, unless the parties agree to an alternative means of production.

8. In producing the documents called for herein, segregate the documents so as to identify the numbered requests to which such documents respond.

9. Each request for documents, and each subsection of each request for documents, is to be fully and separately answered.

10. A request for a document shall include a request for all drafts thereof and all revisions and modifications thereto.

**DOCUMENTS TO BE PRODUCED**

The Trustee requests production of the following:

1. All documents that identify persons in possession or control of documents concerning the Debtors.
2. All documents that identify persons in possession or control of assets of the Debtors.
3. All documents that identify persons that have legal or equitable interests in assets in the possession or control of the Debtors.
4. All documents concerning the relationship between the Debtors and any persons with whom the Debtors transacted in the ordinary course of business.
5. All documents that identify any persons with whom the Debtors transacted in the ordinary course of business.
6. All documents concerning any transfers that Debtor made directly or indirectly to each and any Affiliate of the Debtors, Ordonez, Buzaneli, or Rivera. Such documents shall specifically include all bank documents such as bank statements, cancelled checks, wire transfer advices, communications concerning the transfers, etc.
7. All documents concerning any transfers that Debtor made directly or indirectly after January 1, 2009. Such documents shall specifically include all bank documents such as bank statements, cancelled checks, wire transfer advices, communications concerning the transfers, etc.
8. All documents concerning any transfers that Debtor received directly or indirectly after January 1, 2009. Such documents shall specifically include all bank documents such as bank statements, cancelled checks, wire transfer advices, communications concerning the transfers, etc.

{39694001;1}

9. All documents concerning any agreements entered into by and between either of the Debtors and Examinee, whether executory or not, including, without limitation: any agreements related to the operations, management, business relationships, control, financing, distributions, property, rights, and obligations of the Debtors and any documents concerning the termination of any such agreement.

10. All documents concerning any agreements entered into by and between either or both of the Debtors and each and any Affiliate of the Debtors, whether executory or not, including, without limitation: any agreements related to the operations, management, business relationships, control, financing, distributions, property, rights, and obligations of the Debtors and any documents concerning the termination of any such agreement.

11. All documents concerning the relationship between and among the Debtors on the one hand and either Buzaneli, Ordonez, Rivera, or any Affiliate on the other hand.

12. All documents concerning any Claims made by any party against any of the Debtors.

13. All documents concerning the dissolution of any Affiliate, including, without limitation, provisions made for payments of the claims of the Debtors or other Affiliates.

14. All documents concerning any communications by and between either of the Debtors and Examinee.

15. All documents concerning any communications by and between either of the Debtors and Ordonez, Buzaneli, Ordonez, Ribera, or any Affiliate.



16. All documents concerning any communications by and between any officers, directors, shareholders, owners, managers, or employees of the Debtors while acting in their capacities as officers, directors, shareholders, owners, managers, or employees of the Debtors.

17. All documents concerning any communications with any persons that placed assets in the Debtors' possession or under the Debtors' control.

18. All documents concerning any communications with any persons that received assets from the Debtors.

19. All documents concerning any assets in the Debtors' possession or under the control of the Debtors in which the Debtors have any legal or equitable interest.

20. All documents concerning any assets in Buzaneli's possession or under Buzaneli's control in which the Debtors have any legal or equitable interest.

21. All documents concerning any assets in Ordonez's possession or under Ordonez's control in which the Debtors have any legal or equitable interest.

22. All documents concerning any assets in Rivera's possession or under Rivera's control in which the Debtors have any legal or equitable interest.

23. All documents concerning any assets in any Affiliate's possession or under any Affiliate's control in which the Debtors have any legal or equitable interest.

24. All documents concerning any assets in which Debtors have any legal or equitable interest and which either are or are not in the possession of or under the control of the Debtors.

25. All documents concerning any assets under the possession or control of the Debtors, whether or not the Debtors have any legal or equitable interests in such property.

26. A copy of all documents Examinee has under Examinee's possession or control that in any way concerns or relates to either of the Debtors.

TABLE A

Abio Financial Group, Inc., a Texas corporation
<i>All American Quality Corporation, a dissolved Florida corporation</i>
BPA Associates Investment & Trading Company, Inc., a Florida corporation
Antonio Buzaneli d/b/a BPA Capital S.A.
BPA Global Holdings, Inc., a Delaware corporation
BPA Fomento Mercantil Investimento e Participações Ltda. (Brazil)
BPA Holdings, Inc., a Florida corporation
BPA International (Brazil)
Antonio Buzaneli d/b/a BPA Operating
Antonio Buzaneli d/b/a BPA Quality Products
BPA Restaurants, LLC, a Florida corporation
BPA Sourcing, Inc., a Delaware corporation
BPA Technology, Inc., a Florida corporation
Antonio Buzaneli d/b/a Bric SA Corp
Brazilian Fire Corp., a Florida corporation
EMAB Holdings Corp., a Delaware corporation
Global Social Technologies Corp., a Delaware corporation
Antonio Buzaneli d/b/a HML Import and Export
HNH USA Corp., a Florida corporation
International Monetary Mortgage Fund, Inc., a Florida corporation
New Horizon Financial Corporation, a Delaware corporation
Nextvel Corporation, a Puerto Rico corporation
PFI Global Corp., a Delaware corporation
PFI Global Corp., a dissolved Florida corporation
PFIF, Inc., a Delaware corporation
PFIF, Inc., a dissolved Florida corporation
PLP Capital Partners, a Delaware corporation
Providence Asia Finance & Trading Corp., a Delaware corporation
Providence Capital Ventures, LLC, a Delaware corporation
Providence Entertainment & Media, Inc., a Delaware corporation
Providence Global, Inc., a Delaware corporation
Providence Growth Fund LLC, a Delaware corporation
Providence Health Corporation, a Delaware corporation
Providence Holdings International, Inc., a Delaware corporation
Providence Management Services, LLC, a Delaware corporation
Providence Motors and Equipment Corporation, a Florida corporation
Providence Partners, LLC, a Delaware corporation
Providence Partners International, LLC, a Delaware corporation
Providence Preferred Corp. (Hong Kong)
Providence Private Markets Corp., a Delaware corporation
Providence Realty Advisors, LLC f/k/a Providence Realty Companies, LLC, a Florida corporation
Antonio Buzaneli d/b/a Providence Strategic Ventures, LLC

Providence Trade International Corporation, a Delaware corporation
Providence Worldwide Travel Corp., a Delaware corporation
The Providence Companies, LLC, a Florida corporation
Siente Y Vive International Foundation, a Delaware corporation
BPA Internacional Importacao e Exportacao Ltda, a Brazilian company
Providence Equipamentos, Servicos, Importacao e Exportacao Ltda, a Brazilian company
BPA Quality Products Importacao e Exportacao De Equipamentos Medicos Ltda – Epp, a Brazilian company
Satya Vitae Desenvolvimento Humano Ltda, a Brazilian company
Suba Propaganda Ltda, a Brazilian company
Providence Turismo, Viagens e Servicos S.A., a Brazilian company
Providence Recursos Naturais Importacao e Exportacao S.A., a Brazilian company
Providence Fomento Mercantil Investimentos e Participacoes Ltda, a Brazilian company
BPA Trading, Importacao, Exportacao, Industria, Participacoes e Investimentos Ltda, a Brazilian company
BPA Empreendimentos e Participacoes S.A., a Brazilian company
Santa Elisabeth Empreendimentos e Participacoes S.A., a Brazilian company
Lumiere Fomento Mercantil Investimentos e Participacoes S.A., a Brazilian company
Providence Locacao De Veiculos Blindados Ltda, a Brazilian company,
Veneza Comercio De Artigos Para Presentes Ltda, a Brazilian company
Providence Brazilian Brands e Participacoes S.A., a Brazilian company
Providence Solutions Participacoes S.A., a Brazilian company
Providence Spe Holding S.A., a Brazilian company
Providence Health Care, Investimentos e Participacoes S.A., a Brazilian company
Providence Entretenimento, Lazer, Viagens E Participacoes S.A., a Brazilian company
A.J. Participacoes Ltda Lumiere Exportacao, Importacao e Participacoes Ltda, a Brazilian company
Providence Midia Importacao, Exportacao, Servicos e Eventos Do Brasil S.A., a Brazilian company
Providence Global Ltd., a Guernsey company
Providence Investment Funds PCC Limited, a Guernsey company
Providence Investment Management International Limited, a Guernsey company
Providence Bonds II, PLC., f/k/a Providence Bonds July 2015 PLC, United Kingdom
Lumiere Wealth (London) Limited, United Kingdom
Lumiere Tours International Limited f/k/a Lumiere Tours Limited, United Kingdom
Lumiere Lifestyle Limited f/k/a Providence Transport & Logistics Limited Private Limited
Providence Bonds PLC, United Kingdom
Lumiere Financial Advisory Limited Providence Financial Solutions Limited, United Kingdom
Providence Wealth Limited, United Kingdom