

rec'd 4/6/05
DEG

STATE OF NORTH CAROLINA

WAKE COUNTY

IN A MATTER
BEFORE THE COMMISSIONER OF BANKS
DOCKET NO. 2005:008:CF

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| <p>IN RE:</p> <p>ADVANCE AMERICA, CASH ADVANCE CENTERS OF NORTH CAROLINA, INC.</p> | <p>) RESPONDENT ADVANCE AMERICA,) CASH ADVANCE CENTERS OF NORTH) CAROLINA, INC.'S FIRST SET OF) REQUESTS FOR PRODUCTION OF) DOCUMENTS AND,) INTERROGATORIES TO THE NORTH) CAROLINA BANKING COMMISSION,) OFFICE OF THE COMMISSIONER OF) BANKS AND THE NORTH CAROLINA) OFFICE OF THE ATTORNEY GENERAL)</p> |
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TO: The Honorable Joseph Smith, Esq.
North Carolina Commissioner of Banks
316 West Edenton Street
Raleigh, NC 27602

L. McNeil Chestnut, Esq.
Special Deputy Attorney General
North Carolina Department of Justice
114 West Edenton Street
Raleigh, North Carolina 27602

Phillip A Lehman
Assistant Attorney General
North Carolina Department of Justice
9001 Mail Service Center
Raleigh, North Carolina, 27699-9001

NOW COMES Respondent, Advance America, Cash Advance Centers of North Carolina, Inc. ("AANC"), through counsel, and pursuant to N.C.G.S. § 150B-39, 4 NCAC § 3B.0209, and Rules 26, 33, 34 and 36 of the North Carolina Rules of Civil Procedure, and serves

the following Requests for Production of Documents ("RFP") and Interrogatories upon the North Carolina Banking Commission, the North Carolina Commissioner of Banks, and the North Carolina Office of the Attorney General, each discovery request and/or interrogatory to be answered separately and fully, in writing, under oath, and independently by each of the government agencies, with responses to be served on counsel for Respondent within fourteen days. These RFPs and Interrogatories shall be deemed continuing in nature pursuant to Rule 26 of the North Carolina Rules of Civil Procedure, and you are required to serve supplemental responses if and when any additional responsive information comes to your attention or becomes available to you.

DEFINITIONS AND INSTRUCTIONS

1. The North Carolina Banking Commission, the North Carolina Commissioner of Banks, and the North Carolina Attorney General (together, the "government representatives") are each independently required to respond to each of these Requests for Production and Interrogatories as contemplated and required by the North Carolina Rules of Civil Procedure and the rules for contested hearings before the North Carolina Banking Commission. References to the "government representatives" shall include any and all of the named agencies and offices, or any individual employee(s) of those agencies and offices.

2. The term "document" is defined to be synonymous in meaning and equal in scope to the usage of this term in North Carolina Rule of Civil Procedure 34(a), and shall include any tangible thing upon which information is or has been stored, recorded, or communicated, in or through any medium, including, but not limited to: records, letters, notes, working papers, correspondence, invoices, contracts, agreements, purchase orders, memoranda, tapes, transcripts, stenographical or handwritten notes, microfilm, bulletins, studies, test results and reports, logs,

worksheets, circulars, pamphlets, studies, reports, notices, diaries, calendars, summaries, surveys, books, manuals, financial statements or reports, telephone logs, messages, questionnaires, instructions, photographs, film, graphs, statistical compilations, sound recordings, magnetic discs, records, and tapes, electronically stored mail ("e-mail"), records, and printouts.

3. As used herein, the term "identify" when used in reference to natural persons shall mean to state the persons' full names, title(s), and job description(s), if applicable, and their present business and home address(es) and telephone number(s).

4. As used herein, the term "identify" when used in reference to documents shall mean to describe the documents, setting forth their dates, titles, authors, addresses, parties and contents with reasonable particularity.

5. As used herein, the term "identify" when used in reference to oral statements and communications shall mean to describe the statements and communications by (a) stating when and where they were made; (b) identifying each of the makers and recipients thereof in addition to all other persons present; (c) indicating the medium of communication; and (d) stating their substance.

6. The use of the singular form of any word includes the plural and vice versa.

7. Should any of these requests or interrogatories call for any of the government representatives to identify or produce a document or describe information which would otherwise be responsive except for the fact that the answering party claims such document or information is privileged or confidential (by operation of statute), then the answering party shall so state and identify the information or document to a degree sufficient to allow the Commissioner to rule, if necessary, on such claim of privilege or a motion to compel discovery. Such information shall reasonably include the type of document, the author, all known recipients, and a general

description of the document's subject matter. This is commonly referred to as a "Privilege Log" and may be so entitled by the answering/objecting party.

8. The term "concerning" means in any way relating to, referring to, describing, evidencing, or constituting.

9. The conjunctive "and" and the disjunctive "or" are mutually interchangeable and are meant to encompass each other.

10. When used in this document, the term "sunset" refers to the August 31, 2001 date on which N.C.G.S. § 53-281 finally expired.

11. When used in this document, the term or phrase "payday lending" is defined and used in the same manner that it was defined and used by the Commissioner of Banks in the Notice of Hearing and Order for a Pre-hearing Conference in this matter. However, its use in these RFPs and Interrogatories is intended for efficiency purposes only and is in no way intended to communicate agreement as to whether the term "lending," as interpreted and/or used and defined in the North Carolina General Statutes, is applicable to the business activities of AANC.

12. When used in this document, the term "you" and "your" shall be defined to include any individual employee or agent of the office, agency or organization to whom these requests and interrogatories are directed.

13. Unless otherwise noted, all document requests and interrogatories pertain to documents and information either in effect or created on or after January 1, 1997, to the present.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Please produce the following documents to the extent that they are in your care, custody or control and, with respect to each individual document that you produce and/or group of documents (if the production is of multiple pages constituting one document), please identify the specific request to which you consider your production to be responsive:

1. All documents created by or on behalf of the government representatives associated with or in furtherance of the Commissioner of Banks' investigation(s):
 - A. Into AANC's business operations within the State of North Carolina, or elsewhere; and
 - B. Into any other company, business or individual whose business activities have been investigated in an effort to determine whether said company, business or individual was engaged in "payday lending," deferred presentment lending, or other lending programs in violation of or consistent with North Carolina law.
2. Any and all investigative or fact finding reports or memoranda generated by or provided to the government representatives that relate in any way to the North Carolina business activities of AANC.
3. Any and all documents exchanged between the government representatives that relate in any way to the business activities of AANC.
4. Any and all documents generated or assembled by the government representatives forwarded to members of the North Carolina General Assembly (including individual staff members of their offices) and/or the North Carolina Governor's office with regard to payday

lending issues, including but not limited to any correspondence, memoranda, position papers, legal or factual analyses, or written statements or testimony in connection with contemplated or pending legislation.

5. Any and all documents received from members of the North Carolina General Assembly (including individual staff members of their offices) and/or the North Carolina Governor's office with regard to payday lending issues, including but not limited to any correspondence, memoranda, position papers, legal or factual analyses, or written statements or testimony in connection with contemplated or pending legislation.

6. Any and all documents sent to or received from state banking commissions and or state banking commissioners in other states, or similar agencies, Attorney General's offices of other States, or other state or federal regulators that concern payday lending issues.

7. Any and all documents received from any state agencies, other than the government representatives addressed in these document requests, in North Carolina concerning payday lending issues.

8. Any and all documents that relate to payday lending issues that were sent to or received from groups or entities of any title or nature that are identified colloquially as consumer advocate/consumer rights groups, or the individuals associated with such groups, including but not limited to the Center for Responsible Lending, the Coalition for Responsible Lending, the Self Help Credit Union, the Self Help Assistance Corporation, the Self Help Services Corporation, the Community Reinvestment Association of North Carolina, the North Carolina Justice Center, the North Carolina Justice and Community Development Center, the Financial Protection Law Center, and the Trial Lawyers for Public Justice, which documents relate to payday lending issues.

9. Any and all documents that relate to payday lending issues that were sent to or received from any outside attorneys or law firms, including but not limited to J. Jerome Hartzell or any individual associated with the law firm of Hartzell & Whiteman, LLP; Carlene McNulty or any individual associated with the North Carolina Justice Center; Mona Lisa Wallace, John Hughes or any individual associated with the law firm of Wallace & Graham, P.A.; Mallam J. Maynard or any individual associated with the Financial Protection Law Center; F. Paul Bland, Jr. or any individual associated with the Trial Lawyers for Public Justice; Stephen Gardner or any individual associated with the Law Office of Stephen Gardner, PC; or Richard A. Fisher.

10. Any and all documents created by any government representatives, including but not limited to the following individuals, that in any way concerning payday lending issues in North Carolina prior to or after the August 31, 2001 sunset of N.C.G.S. § 53-281:

- A. Attorney General Roy Cooper
- B. Joshua N. Stein
- C. Philip A. Lehman
- D. L. McNeil Chestnut
- E. Daniel Garner
- F. M. Lynne Weaver
- G. Reitzel Deaton
- H. Hal Lingerfelt

11. Any and all documents concerning payday lending issues created by the Office of the Commissioner of Banks.

12. Any and all documents contained within or otherwise considered a part of - Commissioner Lingerfelt's file and/or investigative materials of any government representative

concerning any investigation of AANC's business activities in North Carolina prior or subsequent to the August 31, 2001 sunset of N.C.G.S. § 53-281, including but not limited to any factual or legal analyses.

13. Any and all documents contained within or otherwise considered a part of Commissioner Lingerfelt's file and/or investigative materials of any government representative concerning any investigation of ACE Cash Express, Inc.'s ("ACE") business activities in North Carolina prior or subsequent to the August 31, 2001 sunset of N.C.G.S. § 53-281, including but not limited to any factual or legal analyses.

14. Any and all documents contained within or otherwise considered a part of Commissioner Lingerfelt's file and/or investigative materials of any government representative concerning any investigation of Goleta National Bank's ("Goleta") business activities in North Carolina prior or subsequent to the August 31, 2001 sunset of N.C.G.S. § 53-281, including but not limited to any factual or legal analyses.

15. To the extent that you intend to call an expert witness or otherwise intend to present opinion evidence at the hearing in this matter, please produce the curriculum vitae of the expert and or other witness through whom you intend to introduce expert opinion testimony, as well as any and all reports, including, without limitation, any draft reports, notes, correspondence, or other documents created by those individuals concerning any and all of the facts or issues to be addressed and or decided in this proceeding, and their opinions, analysis or thoughts relative to said issues.

16. Any and all expert reports and/or correspondence or notes of or with expert witnesses that provided opinion testimony or other evidence in the ACE investigation or litigation (captioned: *State of North Carolina ex rel. Roy Cooper, Attorney General and Hal D.*

Lingerfelt, Commissioner of Banks v. ACE Cash Express, Inc., and bearing Wake County civil action number 02 CVS 000330 and which, after removal to the Federal Court for the Eastern District of North Carolina, bore civil action number 5:02-CV-69-F(3)) concerning its payday lending business operations in North Carolina.

17. Any and all expert reports and/or correspondence or notes of or with expert witnesses that provided opinion testimony or other evidence in the Goleta investigation or litigation (captioned *Goleta National Bank and Ace Cash Express, Inc. v. The Honorable Hal D. Lingerfelt, in his official capacity as the Commissioner of Banks of North Carolina and The Honorable Roy Cooper, in his official capacity as the Attorney General of North Carolina*, and bearing federal civil action number 5:02-CV-20-F(3)) concerning its payday lending business operations in North Carolina.

18. Any and all formal or informal opinions, rulings, announcements, and/or factual or legal memoranda or materials concerning payday lending issues in North Carolina prior or subsequent to the August 31, 2001 sunset of N.C.G.S. 53-281.

19. Any and all formal or informal opinions, rulings, announcements, and/or factual or legal memoranda concerning the business operations of other payday cash advance companies, including but not limited to the following companies:

- A. AANC
- B. Ace Cash Express, Inc.
- C. Goleta National Bank
- D. Check 'N Go
- E. Check Into Cash
- F. Cash America International, Inc.

- G. QC Financial Services
- H. Valued Services, LLC
- I. Cash America Financial Services, Inc.
- J. Foresight Management Company, LLC
- K. Nationwide Budget Finance
- L. Compucredit
- M. First American

20. Any and all formal or informal opinions, rulings, announcements, and/or factual or legal memoranda created or received by you concerning the authority and/or jurisdiction of the government representatives, or the lack of authority and/or jurisdiction, to regulate or otherwise control payday lending activities in North Carolina subsequent to August 31, 2001, even if such documents were created prior to that date.

21. Any and all correspondence in any form whatsoever exchanged between the government representatives concerning payday lending activities by any company doing business in North Carolina.

22. Any and all formal or informal opinions, memoranda or correspondence created in response to an inquiry or complaint by any individual consumer, consumer advocate or consumer advocacy group regarding payday lending issues in North Carolina, and any and all such inquiries and complaints.

23. Any and all documents sent to or received from or directed to the National Association of Attorneys General ("NAAG") regarding payday lending issues.

24. Any and all documents sent to or received from or directed to the Conference of State Bank Supervisors ("CSBS") regarding payday lending issues.

25. Any and all documents or communications concerning payday lending activities that were received from or sent to any North Carolina State Governmental Agency, excepting the government representatives addressed in these document requests.

26. Any and all internal memoranda concerning your agency's, office's and/or organization's plan of action, intentions, analyses or intended chronology regarding administrative investigations and/or administrative action(s) against business in North Carolina that you believe(d) were involved in payday lending activities in North Carolina subsequent to August 31, 2001, even if such documents were created before that date.

27. Any and all documents reflecting your office's, agency's, or organization's plan of action relative to businesses that you believe(d) were/are engaged in payday lending activities in North Carolina, which documents were created prior or subsequent to execution of the consent order in the ACE payday lending litigation.

28. Any articles, statements, testimony, reports, power point presentations, speeches, "white papers" or other similar documents created by you concerning payday lending activities in North Carolina or elsewhere.

29. Any and all statements by any of the government representatives, including but not limited to the following individuals, concerning payday lending activities in North Carolina or elsewhere subsequent to August 31, 2001, made or given to the print or online media in North Carolina:

- A. Attorney General Roy Cooper;
- B. Joshua Stein;
- C. L. McNeil Chestnut;
- D. Philip Lehman;

- E. Daniel Garner;
- F. Commissioner Joseph A. Smith, Jr.;
- G. Commissioner Hal Lingerfelt; or
- H. Any Commissioner, Chairman or Member of the Banking Commission .

30. Any and all speeches given by Attorney General Roy Cooper in any public or private forum during his campaign or after his election to the Office of North Carolina Attorney General concerning or referencing payday lending activities in North Carolina or elsewhere, whether the speech was given prior to, on, or after August 31, 2001.

31. Any and all documents concerning the sunset or expiration of N.C.G.S. § 53-281 including but not limited to opinions, plans, analyses or strategies to seek administrative or and legal remedies against companies doing business in North Carolina that you believe(d) continued to be involved in any way in payday lending activities subsequent to August 31, 2001, even if such documents were created prior to that date.

32. Any and all documents reflecting events, conversations, or meetings between your office, agency or organization and any individual, business, group of businesses, or trade organization concerning payday lending activities in North Carolina subsequent to August 31, 2001.

33. Any documents created and sent by you to any company or business that you believe(d) was/were engaged in the business of payday lending in North Carolina subsequent to August 31, 2001.

34. Any and all documents received by you from any company that you believe(d) was/were engaged in the business of payday lending in North Carolina subsequent to August 31, 2001.

35. Any and all documents sent to or received from any federally insured or federally chartered bank known or believed to be doing business with AANC in North Carolina.

36. Any and all documents sent to or received from any federally insured or federally chartered bank known or believed to be doing payday lending business with other companies in North Carolina.

37. Any and all documents, including, without limitation, investigative reports, expert opinions, correspondence and notes contained your investigative files or the files of any individual cooperating or affiliated with you or acting as your agent or independent contractor concerning the investigation(s) into alleged payday lending activities of any company, including but not limited to the following companies:

- A. McKenzie Check Advance of North Carolina, LLC d/b/a National Cash Advance
- B. National Cash Advance
- C. Check'n Go
- D. Check Into Cash
- E. Valued Services, LLC
- F. QC Financial Services
- G. Cash America Financial Services, Inc.
- H. Foresight Management Company, LLC
- I. Nationwide Budget Finance
- J. Compucredit

- K. Cash America International, Inc.
- L. First American
- M. AANC

38. Any and all documents supporting your use and definition of the terms "fee" and "finance charge" as those terms are used in paragraph 5 of the Commissioner of Banks' Notice of Hearing in this matter ("Notice") (in responding to this Request for Production, please identify particular documents and or pages/lines of testimony and/or North Carolina Statutory language).

39. Any and all documents supporting your use and definition of the phrase "originates payday loans" as it is used in paragraph 8 of the Notice (in responding to this Request for Production, please identify particular documents and or pages/lines of testimony and/or North Carolina Statutory language).

40. Any and all documents supporting your use and definition of the phrase "payday lending presence" as it is used in paragraph 14 of the Notice (in responding to this Request for Production, please identify particular documents and or pages/lines of testimony and/or North Carolina Statutory language).

41. Any and all documents supporting your use and definition of the phrase "substantial portion of the loan fees" as it is used in paragraph 15 of the Notice (in responding to this Request for Production, please identify particular documents and or pages/lines of testimony and/or North Carolina Statutory language).

42. Any and all documents obtained from any source, or received from Republic Bank & Trust Company ("RB&T") relative to RB&T's business and/or affiliation with AANC.

43. Any and all documents supporting your use and definition of the following terms as those terms are used in paragraph 27 of the Notice in reference to AANC's business activities

in North Carolina on or after August 31, 2001 (in responding to this Request for Production, please identify particular documents and/or pages/lines of testimony and/or North Carolina Statutory language):

- A. "Offering"
- B. "Arranging"
- C. "Collecting"

44. Any and all documents relied upon to form the basis of the allegation that AANC is "engaged in the business of lending" in North Carolina as that term is used in paragraph 1 of the "Claims for Relief" section of the Notice (in responding to this Request for Production, please identify particular documents and or pages/lines of testimony and or North Carolina Statutory language the referenced allegation).

45. Any and all documents supporting your use of the phrase "endorsing or otherwise securing loans or contracts for the payment of loans" in paragraph 1 of the "Claims for Relief" section of the Notice (in responding to this Request for Production, please identify particular documents and or pages/lines of testimony and or North Carolina Statutory language the referenced allegation).

46. Any and all documents relied upon to support the allegation that AANC "seeks to avoid [application of N.C.G.S. § 53-166(a)] by any device, subterfuge, or pretense whatsoever" as it is stated in paragraph 2 of the "Claims for Relief" section of the Notice."

47. Documents relied upon to support the allegation in paragraph 3 of the "Claims for Relief" section of the Notice that AANC is engaging in or has engaged in "the business of cashing checks, drafts, or money orders for consideration," as well as the use of the term "avoid" in the same paragraph.

48. Any and all documents upon which you rely to define the phrase “for consideration” as it is used in paragraph 3 of the “Claims for Relief” section of the Notice.

49. To the extent that you believe or assert that AANC’s receipt of payment, by a federally chartered or federally insured bank, for services rendered to said bank constitutes receipt of “for consideration” in violation of any North Carolina General Statute, please produce any and all documents relied upon to form the basis of your use and definition of the phrase “for consideration” as it is used in paragraph 3 of the “Claims for Relief” section of the Notice.

50. Any and all documents relied upon to support the allegations contained in the fifth paragraph (which is incorrectly denoted as No. “6”) of the “Claims for Relief” section of the Notice and, without limitation, the specific allegations that:

- A. AANC may be engaged in the business of lending within the meaning of N.C.G.S. § 53-166;
- B. AANC offers consumer loans (and your support for the definition and use of the term “offers” as it is used in that paragraph);
- C. AANC arranges consumer loans (and your support for the definition and use of the term “arranges” as it is used in that paragraph);
- D. AANC originates consumer loans (and your support for the definition and use of the term “originates” as it is used in that paragraph);
- E. AANC collects consumer loans (and your support for the definition and use of the term “collects” as it is used in that paragraph);
- F. AANC “contracts for, exacts or receives in connection with such loans, directly or indirectly, “charges” in connection with loans (and your support for the definition and use of the phrase “contracts for, exacts or receives in

connection with such loans, directly or indirectly, charges” as it is used in that paragraph).

51. Any and all documents supporting the allegations in paragraph 6 of the “Claims for Relief” section of the Notice that there is “good cause to believe that AANC may be cashing checks for consideration in violation of G.S. § 53-276.”

52. Any and all documents forming the basis for your definition and use of the term “consideration” as that term is used in paragraph 6 of the “Claims for Relief” section of the Notice in relation to G.S. § 53-276.

INTERROGATORIES

1. Provide the definition that you intend to apply to each of the terms or phrases from the Notice that are quoted in the above Requests for Production of Documents at/in request nos.: 39, 40, 41, 42, 44, 45, 46, 48, 49, 50 and 52, and with respect to each identified term or phrase, identify the source that you used in defining said term or phrase.

RESPONSE:

2. Define the term “deferred deposit cash advance centers” as that term is used in the Notice and explain all characteristics that combine to create such a “center.”

RESPONSE:

3. Identify any distinctions known to you between an “account controlled by the bank,” as that phrased is used in paragraph 8 of the Notice in reference to a federally insured,

out-of-state bank, and actual ownership of the referenced account by the federally insured "out-of-state-bank."

RESPONSE:

4. Identify, with specificity, the relevance (relative to any allegations of misconduct or violations of North Carolina law by AANC) of the allegations in paragraph 16 of the Notice regarding the "customer's perspective" of the loan process, and the allegation in that paragraph that, from that perspective, the "loan process" and "documentation" are "substantially the same."

RESPONSE:

5. With respect to paragraphs 14-26, inclusive, contained within the Notice, identify which North Carolina statutes or laws, if any, were violated as a result of the conduct and/or allegations described in the subject paragraph, and if more than one action is described and/or you believe more than one statute or law is violated, then identify each specific act that violates any statute or law and identify the statute or law that you believe to be violated.

RESPONSE:

6. State your factual basis for the claim that the payment that AANC receives from a federally chartered bank for the services that it provides to that federally chartered bank constitutes "consideration" from consumers or customers for loans such that AANC may be treated as the lending institution.

RESPONSE:

7. To the extent you intend to offer any expert witness opinion testimony or evidence at the hearing in this matter, identify the following information about any such expert:

- A. Name, address, telephone number, and email address;
- B. area(s) of expertise;
- C. issues upon which the witness is expected to testify and/or opine;
- D. the witnesses' opinions relative to each of the issues that you identified in response to this Interrogatory; and
- E. the basis for each opinion identified in response to this interrogatory.

RESPONSE:

8. Identify each and every individual currently or previously employed by you that has met with and/or participated in or attended meeting(s) with members, agents or employees of businesses engaged in payday lending operations in North Carolina prior or subsequent to August 31, 2001 and/or with trade organizations representing the interests of such businesses, and with respect to each such individual, state the following:

- A. date of the meeting or conference;
- B. subject of the meeting or conference;
- C. whether or not the identified individual spoke during the meeting or conference;
- D. if the identified individual spoke during the meeting or conference, the substance of his or her comments;
- E. identification of all other participants in the identified meeting or conference; and
- F. whether or not the identified individual took notes or spoke from prepared remarks during the meeting or conference.

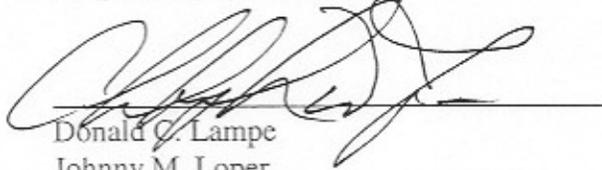
RESPONSE:

9. Identify specific and/or particular consumers whom you allege paid money (in any form) to AANC in consideration or exchange for a short term loan since August 31, 2001.

RESPONSE:

This the 3rd day of March, 2005.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Donald C. Lampe', written over a horizontal line.

Donald C. Lampe

Johnny M. Loper

Christopher W. Jones

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CERTIFICATE OF SERVICE

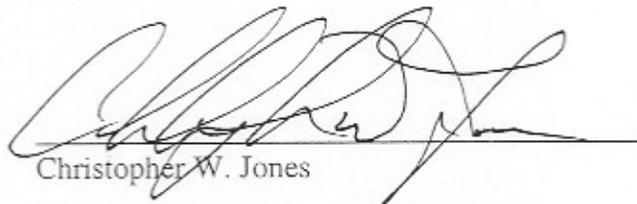
I hereby certify that I have this day served **RESPONDENT ADVANCE AMERICA, CASH ADVANCE CENTERS OF NORTH CAROLINA, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND, INTERROGATORIES TO THE NORTH CAROLINA BANKING COMMISSION, OFFICE OF THE COMMISSIONER OF BANKS AND THE NORTH CAROLINA OFFICE OF THE ATTORNEY GENERAL** in the above-captioned action upon all parties both electronically (by e-mail (.pdf format)) and by depositing copies in the United States Mail, first-class postage prepaid, addressed as noted below:

The Honorable Joseph Smith, Esq.
North Carolina Commissioner of Banks
C/O Daniel Garner
316 West Edenton Street
Raleigh, NC 27602

L. McNeil Chestnut, Esquire
Special Deputy Attorney General
Administrative Division
North Carolina Department of Justice
9001 Mail Service Center
Raleigh, NC 27699-9001

Phillip A Lehman
Assistant Attorney General
North Carolina Department of Justice
9001 Mail Service Center
Raleigh, North Carolina, 27699-9001

This the 3rd day of March, 2005.



Christopher W. Jones