

IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO. 127 OF 1999

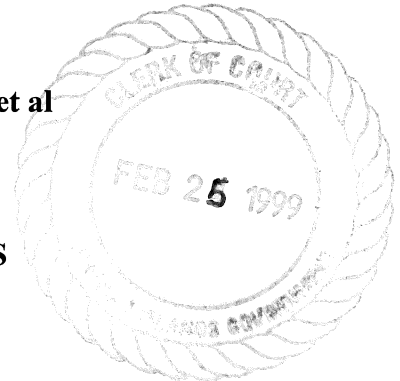
IN THE MATTER OF AN APPLICATION BY THE ATTORNEY GENERAL
PURSUANT TO SECTION 10 OF THE PROCEEDS OF CRIMINAL CONDUCT
LAW 1996

AND

IN THE MATTER OF THE MUTUAL LEGAL ASSISTANCE
(UNITED STATES OF AMERICA) LAW 1986

AND

IN THE MATTER OF ALAN D. KAPLAN et al



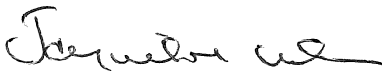
EX PARTE ORIGINATING SUMMONS

LET ALL PARTIES attend before the Judge in Chambers at the Law Courts, George Town, Grand Cayman on the 25 day of February, 1999, at 2:15 o'clock in the fore/afternoon, on the hearing of an application by the Attorney General for orders that:

1. ALAN D. KAPLAN, hereinafter referred to as "the Defendant", whether by himself or by his agents, directors, servants, officers or otherwise howsoever until further order, be restrained from transferring, assigning, withdrawing, removing from the jurisdiction, or otherwise disposing of or dealing with any funds currently deposited to any account at Barclays Bank Plc, Grand Cayman in the name of Blue Horizon Distributors or for the benefit of the Defendant, and without prejudice to the generality of the foregoing, from in any way however:-
 - (a) transferring, assigning, withdrawing, removing from the jurisdiction, disposing of or otherwise dealing with any funds deposited to account number 7009274 held at Barclays Bank Plc;

- (b) transferring, assigning, withdrawing, removing from the jurisdiction, disposing of or otherwise dealing with any funds deposited to account number 1172912 held at Barclays Bank Plc;
2. The Court file in relation to this matter be deemed a closed file to be kept in a safe place in the office of the Clerk of Courts until further order.
 3. Service of the Order of the Court and a copy of the affidavit of Jacqueline Wilson sworn in support thereof shall be effected upon the Defendant by:
 - (a) Effecting service of the said documents upon Barclays Bank Plc;
 - (b) Delivery of the said documents to the Office of International Affairs at the Department of Justice of the United States of America and to the United States Attorney's Office for the District of Arizona for onward delivery to the Defendant.
 4. Such further orders or directions as the Honourable Court shall deem fit.

DATED this 24 day of February, 1999



Jacqueline Wilson
Crown Counsel
For the Attorney General

TIME ESTIMATE: The estimated length of the hearing of this summons is 30 minutes

This summons was issued by the Attorney General whose address for service is Government Legal Department, Fourth Floor, Tower Building, George Town, Grand Cayman.