

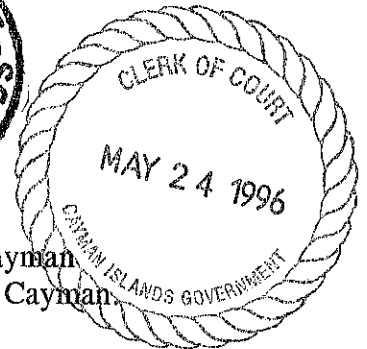
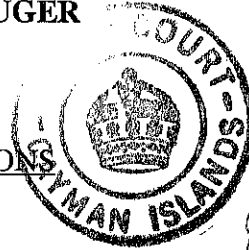
IN THE GRAND COURT OF THE CAYMAN ISLANDS

CAUSE NO: <sup>266</sup> OF 1996

BETWEEN: **ANDRÉ LAAGER** PLAINTIFF

AND: **(1) PETER KRÜGER** DEFENDANTS  
**(2) BARBARA KRÜGER**

WRIT OF SUMMONS



TO: (1) Peter Krüger of Northward Prison, Northward, Grand Cayman  
(2) Barbara Krüger of Victorian House, Cayman Kai, Grand Cayman

THIS WRIT OF SUMMONS has been issued against you by the above-named Plaintiff in respect of the claim set out on the next page.

Within 14 days after the service of this Writ on you, counting the day of service, you must either satisfy the claim or return to the Court Office, P.O. Box 495G, George Town, Grand Cayman, the accompanying Acknowledgment of Service stating therein whether you intend to contest these proceedings.

If you fail to satisfy the claim or to return the Acknowledgment within the time stated, or if you return the Acknowledgment without stating therein an intention to contest the proceedings, the Plaintiff may proceed with the action and judgment may be entered against you forthwith without further notice.

Issued this 24th day of May, 1996.

NOTE - This Writ may not be served later than 4 calendar months (or, if leave is required to effect service out of the jurisdiction, 6 months) beginning with the date of issue unless renewed by order of the Court.

**IMPORTANT**

Directions for Acknowledgment of Service are given with the accompanying form.

THE PLAINTIFF claims that:

1. A Declaration be made by the Court that the Plaintiff is entitled to enforce the judgment debt obtained against the 1st Defendant by Order of the Court dated 3rd May, 1996 (Cause No. 77 of 1996) against:
  - (a) the shares of all the companies listed in Schedule 1 Parts A and B;
  - (b) the sums standing to the credit of the bank accounts listed in Schedule 2;
  - (c) the contents of the safe deposit boxes listed in Schedule 3;
  - (d) the aeroplane, motor vehicles and boat listed in Schedule 4;
  - (e) the land listed in Schedule 5;
  - (f) the receivables listed in Schedule 6,

on the grounds that the 1st Defendant is (directly or indirectly) the legal and beneficial owner of the said property and/or the legal title to the said property is held by nominees for the 1st Defendant absolutely and/or the beneficial interest in the said property is liable to be set aside on grounds that it was transferred to the 2nd Defendant and/or other nominees in or about 1993 and 1994, either for no consideration or at an undervalue and with intention to defraud creditors.

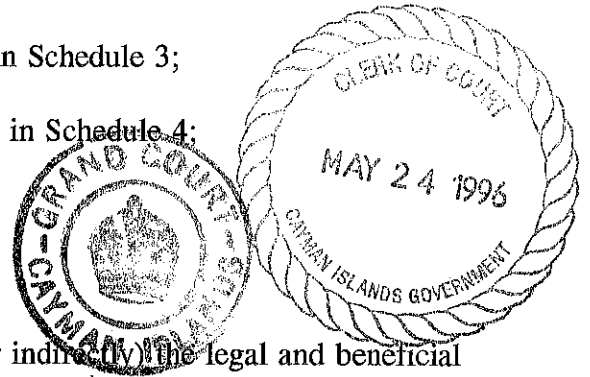
2. A declaration be made that the Plaintiff is entitled to enforce directly against the assets owned by the companies listed in Schedule 1 Part A on the grounds that the structure of ownership of those assets through the companies is a sham devised by the 1st Defendant to defraud his creditors.
3. Such further or other relief as the Court thinks fit.
4. An Order for costs be made.

*Maples & Calder*

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Maples and Calder

THIS WRIT was issued by Maples and Calder, Attorneys for the Plaintiff, whose address for service is Ugland House, P.O. Box 309, George Town, Grand Cayman



**SCHEDULE 1****SHARES IN THE COMPANIES****Part A (wholly owned by 1st and/or 2nd Defendants)**

1. Axminster Investments Ltd, a Cayman Islands company
2. Caval Real Estate Management Ltd, incorporated in December 1995
3. Eclipse Investments Inc. (formerly American Equities No. 2 Corp.), a Florida corporation
4. Elegante of South Florida Inc., a Florida corporation
5. Galaxy Trading Limited, Turks & Caicos Islands company
6. GH-80 Acres Inc., a Florida corporation
7. Glenhuntley Investments Limited, a Cayman Islands company
8. Deland Properties of South Florida Ltd., a Florida limited partnership
9. Half Moon of South Florida Inc., a Florida corporation
10. Investments of Brazil Incorporated, a Florida corporation
11. Krüger Business Corporation, a Florida corporation
12. KV Properties No 1 Limited, a Florida limited partnership
13. Largo Ltd, a Bahamian company
14. Le Grand Cayman Limited, a Cayman Islands company
15. Maitland Investments Limited, a Cayman Islands company
16. Morning Investments Limited, a Cayman Islands company
17. Oak Square Inc., a Florida corporation
18. Pines Square Inc., a Florida corporation
19. Quartz Incorporated, a Florida corporation
20. Southland Investments Ltd. (formerly Kruger-Valle Investments Ltd.), a Florida limited partnership
21. Transinvestment Ltd., place of incorporation unknown
22. Trant Investments Ltd., a Cayman Islands company
23. Turtle Fortune Foundation, a Liechtenstein foundation
24. 29 West Associates Ltd., a Florida limited partnership
25. Venus Inc., a Florida corporation
26. Winter Haven Holdings Ltd., a Cayman Islands company
27. Canadian Equities Corporation, an Ontario company
28. Canadian Portfolio Limited, a Cayman Islands company
29. Snow Flake Inc., a Florida corporation
30. Shady Lane Spa Corporation, an Ontario company
31. The Eleanor Fulcher Spa Partnership, an Ontario limited partnership
32. Eleanor Fulcher Limited, an Ontario company
33. Muskoka Spa Corporation, an Ontario company
34. Manax Investments Limited, a Bahamian company

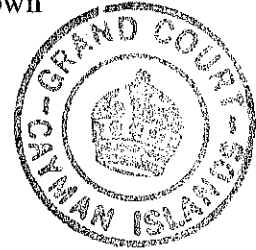


- 35. The United Group of Miami, a Florida limited partnership
- 36. Soap Associates, a Florida limited partnership
- 37. Hampton Investments Inc., a Florida corporation
- 38. Northern Growth Capital Ltd., a Canadian company
- 39. 484236 Alberta Ltd., a Canadian company



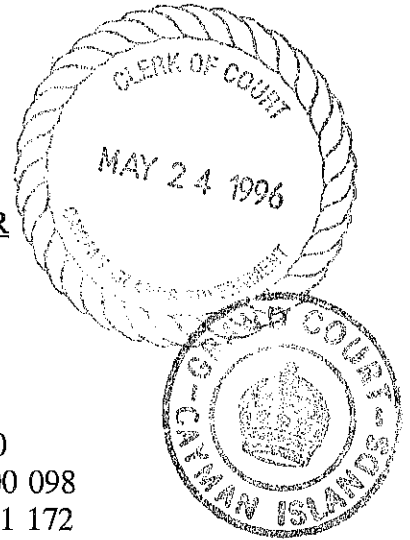
**Part B (minority interests owned by the 1st and/or 2nd Defendant)**

- 40. Cayman Land Ltd, a Cayman Islands company
- 41. The Tropical Building Corporation Ltd., a Cayman Islands company
- 42. Vista Investments of Arizona Inc., place of incorporation unknown
- 43. Suds Inc., a Florida corporation

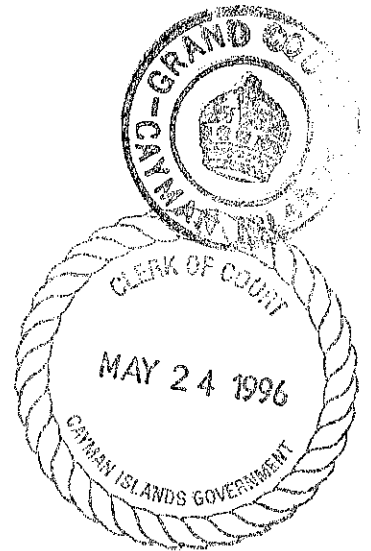


**SCHEDULE 2****The Bank Accounts**

<b><u>BANK &amp; BENEFICIARY</u></b>	<b><u>ACCOUNT NUMBER</u></b>
<b>Bank of Montreal</b> Peter and Barbara Krüger	8244-250
<b>Banque Populaire de la Cote d'Azur</b> Peter and Barbara Krüger Barbara Krüger Peter Krüger Barbara Krüger Barbara Krüger Barbara Krüger	05 717 541 300 FFR 44 027 900 098 US\$ 22 100 001 172 Can \$22 100 003 428 CHF 22 100 006 354 56 44 02790009
<b>Banque du Seeland, (now SBC), Bienne, Switzerland</b> Barbara Krüger	8C-574 097-1
<b>Caisse Nationale de Crédit Agricole, San Tropez</b> Barbara Krüger	7326291301
<b>Migrosbank AG, Switzerland</b> Barbara Krüger	841.478.0-06/16
<b>Ocean Bank, Florida</b> Eclipse Investment Inc. Barbara Krüger/Peter Krüger/ John Broadbent/Alexandra Oesch	0303104141-09  215787308
<b>Republic National Bank of Miami</b> Peter Krüger or Barbara Krüger or Alexandra Oesch	  037-840-003-3
<b>The Royal Bank of Canada, Grand Cayman</b> Glenhuntley Investments Ltd Axminster Investments Ltd Winter Haven Holdings Ltd Winter Haven Holding Ltd Unknown Account (Peter Krüger's signature)	204-185-3 200-447-1 213-298-3 213-299-1 255-247-0



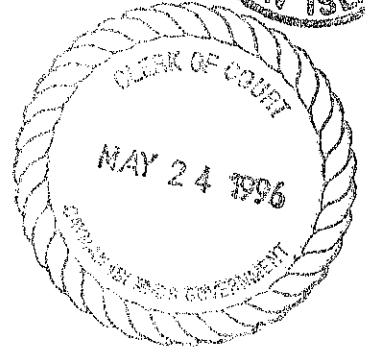
Bruce Campbell & Co. Escrow Account	200-665-8
Barbara Krüger (formerly Peter Krüger)	255-242-0
Barbara Krüger	300-447-7
Barbara Krüger	505-218-8
Largo Ltd.	202-249-5
Manax Investments Ltd.	207-247-8
Barbara Krüger	255-327-0
Trant Investments Ltd.	CD #1935890
	CD #1936092
	CD #1936730
	CD #1936633
Glenhuntley Investments Ltd.	CD #1933841
	CD #1935280
	CD #1936731
<b>The Royal Bank of Canada, Nassau</b>	
Largo Ltd.	411-156-3
Manax Investments Ltd.	412-150-5
<b>The Bank of Nova Scotia, Toronto</b>	
Canadian Equities Corporation	Can\$ 13429-16
	SFr.80002407
<b>Sun Bank/Miami NA</b>	
Peter Krüger	0542008511265
Peter and/or Barbara Krüger	0542002073009
Hampton Investment Inc.	0542001015777
<b>Swiss Bank &amp; Trust Corporation, Grand Cayman</b>	
Glenhuntley Investments Ltd	52.842.10.10
Glenhuntley Investments Ltd.	52.842.12.06
Winter Haven	Unknown
Barbara Krüger	53.025R
<b>Turks &amp; Caicos Banking Company Limited</b>	
Johnston & Associates a/c Escrow	04039906
Galaxy Trading Inc and/or Johnston & Associates	2165
<b>Unknown Bank</b>	
Richard Lehman, Escrow Account for Largo Ltd.	1010028107
<b>Unkown Bank</b>	Unknown account no.

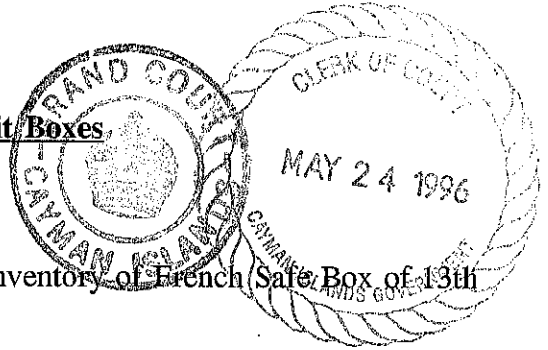


Rasco & Reininger P.A.

**Union Bank of Switzerland, Morat**  
Barbara Krüger

333 493 H1N

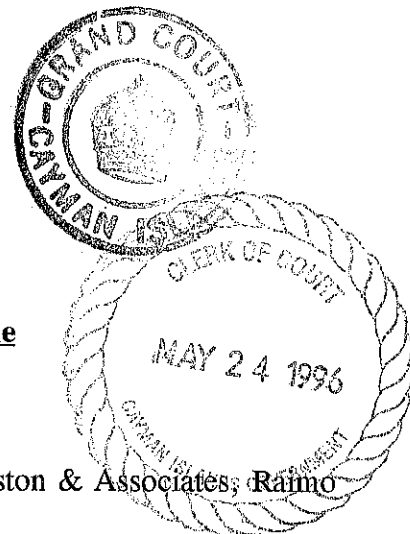


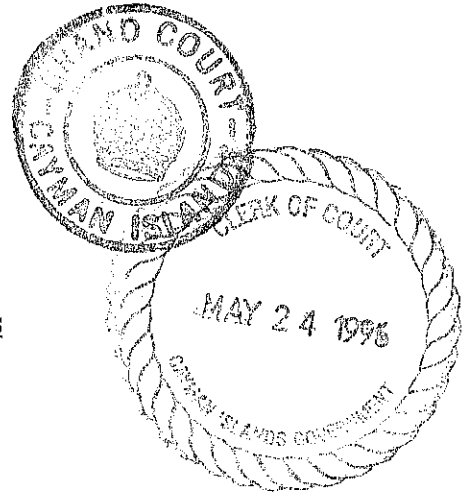
**SCHEDULE 3****The Contents of Safe Deposit Boxes**

1. The box referred to by the 1st Defendant in his "Inventory of French Safe Box of 13th October, 1995".
2. Box No. 305 in the name of Barbara Krüger at the Ocean Bank, Miami.
3. Box No. 309 in the name of Barbara and Peter Krüger at the Ocean Bank, Miami
4. Box No. 107 in the name of Barbara and Peter Krüger at the Republic National Bank of Miami, Fisher Island.
5. Box No. 107 in the name of Peter Krüger at the Plaza Bank of Miami, fisher Island branch.
6. Box No. 221 in the name of H. Morier at Migros Bank, Berne, Switzerland.
7. Box No. 209 in the name of Barbara Krüger at Migros Bank, Berne, Switzerland.
8. Box No. 606 in the name of Barbara Krüger at Migros Bank, Berne, Switzerland.
9. Box No. 103 at Migros Bank, Shopyland, Schönbühl/Berne, Switzerland.
10. Box No. 104 at Migros Bank, Shopyland, Schönbühl/Berne, Switzerland.

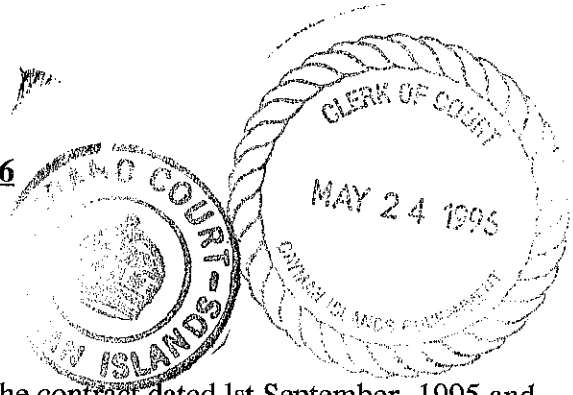
**SCHEDULE 4****Aeroplane, Motor Vehicles, Boat and Wine**

1. Aeroplane CFRUF, stored at Toronto Island Airport by Johnston & Associates; Raimo T. Heikkila, on behalf of Peter Krüger
2. Ferrari Testarossa, chassis no. ZFF-SA75000073795 registered in name of Barbara Krüger on 7 April 1993
3. Ferrari 348 TB, chassis no. ZFF FA 355000096989 registered in name of Barbara Krüger on 26 August 1993
4. Mercedes 500 SL, chassis no. WDB 1290661F048289 registered in name of Barbara Krüger on 20 October 1993
5. White Toyota Land Cruiser, chassis no. FJ62054260 registered in name of Glenhuntley Investments Limited
6. Black Ranger Rover, chassis no. SALLHAMM4GA432882 registered in name of Glenhuntley Investments Limited
7. Ferrari Dino F106 ALA, chassis no. F106ALA15482 registered in the name of Mr and Mrs Peter Krüger
8. Jeep Cherokee, chassis no. 1JENJ17CEDT044557, registered in the name of Barbara Krüger
9. Maserati Kyalami-AM, chassis no. AM129/490286 registered in the name of Mr and Mrs Peter Krüger
10. Mercedes 500 SL, 1992, chassis no. 2DWDBFA66EN2NF063701, registered in the name of Snow Flake Inc.
11. Green Jeep Grand Cherokee, serial no. 154GZ78Y8RC195312, registered in the name of Shady Lane Spa Corporation.
12. The boat known as Barbara I and/or the Victory currently moored on a dock in Finger Quay, Grand Cayman.
13. 288 cases of fine wine located in Canada.



**SCHEDULE 5****Land in the Cayman Islands**

1. West Bay Beach North Registration Section, Block 10E, Parcel 52H2 registered in the name of Axminster Investments Ltd.
2. West Bay Beach South Registration Section, Block 13B, Parcel 1 registered in the name of Le Grand Cayman Ltd.
3. Rum Point Registration Section, Block 33M, Parcel 16 registered in the name of Axminster Investments Ltd.
4. South Sound Registration Section, Block 7D, Parcel 4 registered in the name of Maitland Investments Ltd.
5. West Bay Beach South Registration Section, Block 12D, Parcel 25H44 registered in the name of Axminster Investments Ltd.
6. West Bay Beach South Registration Section, Block 13B, Parcel 7 registered in the name of Morning Investments Ltd.

**SCHEDULE 6****Receivables**

1. Instalments of principal and interest due under the contract dated 1st September, 1995 and made between Cayman Overseas Development Ltd and Le Grand Cayman Ltd.
2. The sums which are or may become payable by Cayman Overseas Development Ltd. to Morning Investments Ltd. pursuant to the option agreement dated 25 May, 1995 or any sale of the land comprised in West Bay Beach South Registration Section, Block 13B, Parcel 7.
3. Rent receivable by Axminster Investments Ltd. from the tenant(s) of the Commonwealth Club, Apartment No.B1 (West Bay Beach North Registration Section, Block 10E, Parcels 52H2 and 52H2).
4. Rent receivable by Axminster Investments Ltd. from the tenant(s) of Britannia, Apartment Nos. 3 and 312 (West Bay Beach South Registration Section, Block 12D, Parcel 25H44).
5. Dividends declared by the following companies and profit shares distributed by the following limited partnerships:
  - (a) dividends payable to Glenhuntley Investments Ltd by The Tropical Building Corporation Limited;
  - (b) dividends payable to Glenhuntley Investments Ltd by Cayman Land Ltd;
  - (c) profit shares in KV Properties No. 1 Limited to Half Moon of South Florida Inc., and/or Eclipse Investments Inc., both Florida corporations owned by Trant Investments Ltd;
  - (d) profit shares distributed by 29 West Associates Ltd to Half Moon of South Florida Inc., and/or Eclipse Investments Inc., both Florida corporations owned by Trant Investments Ltd.;
  - (e) rental income receivable by Hampton Investments Inc., a Florida corporation wholly owned by Glenhuntley Investments Ltd;
  - (f) profit shares distributed by Southland Investments Ltd to Investments of Brazil Incorporated and/or Half Moon of South Florida Inc., both Florida corporations,

the former wholly owned by Manax Investments Limited and the latter wholly owned by Trant Investments Ltd.;

- (g) profit shares distributed by the United Group of Miami Limited to Quartz Incorporated and/or Venus Inc., Florida corporations both wholly owned by Largo Ltd.;
- (h) profit shares distributed by Deland Properties of South Florida Ltd. to Pines Square Inc. and/or Oak Square Inc., Florida corporations wholly owned by Largo Ltd.;
- (i) profit shares distributed by Soap Associates and/or Suds Inc. to Krüger Business Corporation, a Florida corporation wholly owned by the 2nd Defendant.
- (j) interest or other payments to Winter Haven Holdings Ltd. made by First American Title Insurance Company of Arizona as trustee of Trusts No. 8097 (and 4206), Trust No. 8096 and Trust No. 8088.
6. The sums and/or securities standing to the credit of the Bank Accounts.
7. The sums standing to the credit of all escrow accounts, trust accounts or client accounts maintained by the Agents or any of them for the benefit of or upon the instructions of either or both of the Defendants or the Companies.

