

Honorable Samuel J. Steiner

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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE:

MICHAEL R. MASTRO,

Debtor.

BANKRUPTCY NO. 09-16841 (Ch. 7)

JAMES F. RIGBY, JR., Trustee, solely in  
his capacity as Chapter 7 trustee of the  
bankruptcy estate of Michael R. Mastro,

Plaintiff,

ADVERSARY CASE NO. 09-01439-SJS

PLAINTIFF'S FIRST REQUESTS  
TO THE LCY TRUST, COMPASS  
TRUST CORPORATION, AND  
COMPASS S.A. FOR PRODUCTION  
OF DOCUMENTS

v.

MICHAEL R. MASTRO and LINDA A.  
MASTRO; MICHAEL K. MASTRO and  
JANE DOE MASTRO, husband and wife  
and the marital community composed  
thereof; LCY, LLC, a Delaware limited  
liability corporation; MASTRO  
REVOCABLE LIVING TRUST; MASTRO  
IRREVOCABLE TRUST; LCY, LLC-  
SERIES HOMES; LCY, LLC-SERIES  
JEWELRY; LCY, LLC-SERIES  
AUTOMOBILES; THE LCY TRUST, a  
trust purported to be formed in Belize;  
COMPASS TRUST CORPORATION, a

FIRST REQUESTS TO THE LCY TRUST,  
COMPASS TRUST CORPORATION AND  
COMPASS S.A. FOR PRODUCTION - 1

HALL ZANZIG CLAFLIN MCEACHERN

1200 Fifth Ave., Suite 1414, Seattle, WA 98101 206.292.5900

1 trust of unknown origin using an address  
2 in Belize City, Belize; COMPASS S.A.;  
3 CONCEPT DORSSERS, a purported  
4 Monaco company; and FOUNDATION  
MANAGEMENT INC., a Washington  
corporation,

5  
6 Defendants.

7 Plaintiff requests that defendants The LCY Trust, Compass Trust  
8 Corporation, and Compass S.A. ("Defendants") produce within thirty (30) days of  
9 receipt of these document requests the following-described documents for  
10 inspection and copying at the law offices of Hall Zanzig Claflin McEachern PLLC,  
11 1200 Fifth Avenue, Suite 1414, Seattle, Washington 98101, or at such other place as  
12 is mutually agreed upon.  
13

14 Each request for production requests all documents that are in the  
15 custody or control of Defendants, including all documents in the possession of  
16 agents such as accountants, lawyers and other representatives.  
17

#### 18 DEFINITIONS

19 As used in these requests for production, the following words and  
20 phrases shall have the following meanings:  
21

22 1. Document. "Document" is used in the broadest sense  
23 permissible under Fed. R. Civ. P. 34 and is meant to include any medium upon  
24 which intelligence or information can be recorded or retrieved. This includes,  
25 without limitation, the original and each non-identical copy (whether non-  
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1 identical because of alteration, attachments, blanks, comments, notes, underlining  
2 or otherwise) of any paper; photograph; audio tape; video tape; microfilm; data  
3 sheet or data processing card, information stored electronically on computer,  
4 optical disk, floppy disk, hard disk drive, computer tape, or other computer  
5 storage media or any other written, electronically stored, recorded, transcribed,  
6 punched, taped, filmed or graphic matter, however produced or reproduced.  
7

8 Document specifically includes electronic mail ("e-mail").  
9

10 2. Or. The term "or" should not be read to eliminate any part of  
11 any request but, whenever possible, should be used in the sense that the phrase  
12 "and/or" is normally used.

13 3. Claim of Privilege. For each document as to which privilege  
14 is claimed, state the date of the document, the author, the recipient(s) of the  
15 document, the general subject of the document, and the basis for the claim of  
16 privilege.  
17

18 4. Relating. A communication or document "relating" to any  
19 given subject means any communication or document that constitutes, contains,  
20 embodies, reflects, identifies, states, refers to, deals with, or is in any way  
21 pertinent to that subject, including, without limitation, documents concerning the  
22 preparation of other documents.  
23

24 5. LCY LLC Entities. "LCY LLC Entities" means LCY, LLC;  
25 LCY, LLC-Series Homes; LCY, LLC-Series Jewelry; and LCY, LLC-Series  
26

1 Automobiles.

2 **Electronically Stored Information**

3 Pursuant to Fed. R. Civ. P. 34(b)(1)(C), you are requested to produce  
4 all electronically-stored information in native format.  
5

6 **DOCUMENT REQUESTS**

7 REQUEST FOR PRODUCTION NO. 1: All documents relating to the  
8 beneficiaries of The LCY Trust.

9 RESPONSE:  
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12 REQUEST FOR PRODUCTION NO. 2: All documents relating to the  
13 Trustee of The LCY Trust.  
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15 RESPONSE:  
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18 REQUEST FOR PRODUCTION NO. 3: All documents relating to the  
19 Protector of The LCY Trust.

20 RESPONSE:  
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23 REQUEST FOR PRODUCTION NO. 4: All documents relating to the  
24 Advisory Committee for the Protector of The LCY Trust.  
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RESPONSE:

REQUEST FOR PRODUCTION NO. 5: All documents relating to the formation of The LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: All documents relating to any amendments or revisions to The LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7: All documents relating to the implementation or any efforts to implement the powers held by the Trustee under The LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8: All documents relating to assets of The LCY Trust.

RESPONSE:

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REQUEST FOR PRODUCTION NO. 9: All banking records of The  
LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10: All documents relating to  
transactions of any kind engaged in by The LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11: All documents relating to  
the governance of The LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12: All documents relating to  
any employees of The LCY Trust.

RESPONSE:

REQUEST FOR PRODUCTION NO. 13: All documents relating to  
any person or entity holding an ownership interest in The LCY Trust.

RESPONSE:

1                    REQUEST FOR PRODUCTION NO. 14: All documents showing  
2 money received and money spent by or on behalf of The LCY Trust.

3                    RESPONSE:  
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6                    REQUEST FOR PRODUCTION NO. 15: All documents showing the  
7 source of funds used to pay legal fees and other expenses incurred for the benefit  
8 of The LCY Trust.  
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10                   RESPONSE:  
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13                   REQUEST FOR PRODUCTION NO. 16: All documents showing the  
14 distribution of any funds from The LCY Trust.  
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16                   RESPONSE:  
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19                   REQUEST FOR PRODUCTION NO. 17: To the extent not produced  
20 in response to other requests, all documents within the possession or control of  
21 The LCY Trust.

22                   RESPONSE:  
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25                   REQUEST FOR PRODUCTION NO. 18: All documents relating to  
26 the formation of Compass Trust Corporation.

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RESPONSE:

REQUEST FOR PRODUCTION NO. 19: All financial statements for  
Compass Trust Corporation.

RESPONSE:

REQUEST FOR PRODUCTION NO. 20: All records for bank  
accounts maintained by Compass Trust Corporation on its own behalf or for the  
benefit of any other person or entity.

RESPONSE:

REQUEST FOR PRODUCTION NO. 21: All documents relating to  
transactions of any kind engaged in by Compass Trust Corporation with respect to  
any person, entity, or asset in the State of Washington.

RESPONSE:

REQUEST FOR PRODUCTION NO. 22: All documents relating to  
the governance of Compass Trust Corporation.

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RESPONSE:

REQUEST FOR PRODUCTION NO. 23: All documents relating to any employees of Compass Trust Corporation.

RESPONSE:

REQUEST FOR PRODUCTION NO. 24: All documents relating to any person or entity holding an ownership interest in Compass Trust Corporation.

RESPONSE:

REQUEST FOR PRODUCTION NO. 25: All documents showing the source of funds used to pay legal fees and other expenses incurred for the benefit of Compass Trust Corporation with respect to the matters at issue in this adversary proceeding.

RESPONSE:

REQUEST FOR PRODUCTION NO. 26: All documents relating to the formation of Compass S.A.

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RESPONSE:

REQUEST FOR PRODUCTION NO. 27: All financial statements for  
Compass S.A.

RESPONSE:

REQUEST FOR PRODUCTION NO. 28: All records for bank  
accounts maintained by Compass S.A. on its own behalf or for the benefit of any  
other person or entity.

RESPONSE:

REQUEST FOR PRODUCTION NO. 29: All documents relating to  
transactions of any kind engaged in by Compass S.A. with respect to any person,  
entity, or asset in the State of Washington.

RESPONSE:

REQUEST FOR PRODUCTION NO. 30: All documents relating to  
the governance of Compass S.A.

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RESPONSE:

REQUEST FOR PRODUCTION NO. 31: All documents relating to any employees of Compass S.A.

RESPONSE:

REQUEST FOR PRODUCTION NO. 32: All documents relating to any person or entity holding an ownership interest in Compass S.A.

RESPONSE:

REQUEST FOR PRODUCTION NO. 33: All documents showing the source of funds used to pay legal fees and other expenses incurred for the benefit of Compass S.A. with respect to the matters at issue in this adversary proceeding.

RESPONSE:

REQUEST FOR PRODUCTION NO. 34: All documents relating to the LCY LLC Entities.

RESPONSE:

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REQUEST FOR PRODUCTION NO. 35: All documents relating to communications between any of the defendants.

RESPONSE:

REQUEST FOR PRODUCTION NO. 36: All documents relating to communications between legal counsel for defendants concerning any matter that is directly or indirectly related to Michael R. Mastro.

RESPONSE:

REQUEST FOR PRODUCTION NO. 37: All documents relating to Mary Simon, William Vigal, or Vigal & Simon, Inc.

RESPONSE:

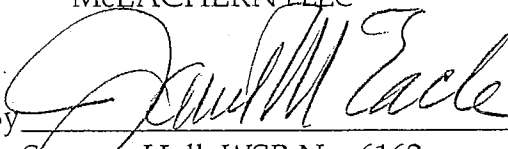
REQUEST FOR PRODUCTION NO. 38: All documents relating to Michael R. Mastro, Linda A. Mastro or Michael K. Mastro.

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DATED this 30<sup>th</sup> day of December, 2009.

HALL ZANZIG CLAFLIN  
McEACHERN PLLC

By 

Spencer Hall, WSB No. 6162  
Janet D. McEachern, WSB No. 14450

BUSH STROUT & KORNFELD  
Gayle E. Bush, WSB No. 7318  
Christine M. Tobin, WSB No. 27628

Attorneys for Plaintiff James F.  
Rigby, Jr., Chapter 7 Trustee of the  
Bankruptcy Estate of Michael R.  
Mastro

RESPONSES dated this \_\_\_\_\_ day of January, 2010.

DAVIS WRIGHT TERMAINE LLP

By \_\_\_\_\_

Richard J. Schroeder, WSBA #11958  
Attorneys for Defendants LCY Trust,  
Compass Trust Corporation, and  
Compass S.A.

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Honorable Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE:

MICHAEL R. MASTRO,  
  
Debtor.

BANKRUPTCY NO. 09-16841 (Ch. 7)

JAMES F. RIGBY, JR., Trustee, solely in  
his capacity as Chapter 7 trustee of the  
bankruptcy estate of Michael R. Mastro,

Plaintiff,

ADVERSARY CASE NO. 09-01439-SJS

PLAINTIFF'S FIRST  
INTERROGATORIES TO  
THE LCY TRUST

v.

MICHAEL R. MASTRO and LINDA A.  
MASTRO; MICHAEL K. MASTRO and  
JANE DOE MASTRO, husband and wife  
and the marital community composed  
thereof; LCY, LLC, a Delaware limited  
liability corporation; MASTRO  
REVOCABLE LIVING TRUST; MASTRO  
IRREVOCABLE TRUST; LCY, LLC-  
SERIES HOMES; LCY, LLC-SERIES  
JEWELRY; LCY, LLC-SERIES  
AUTOMOBILES; THE LCY TRUST, a  
trust purported to be formed in Belize;  
COMPASS TRUST CORPORATION, a

1 trust of unknown origin using an address  
2 in Belize City, Belize; COMPASS S.A.;  
3 CONCEPT DORSSERS, a purported  
4 Monaco company; and FOUNDATION  
MANAGEMENT INC., a Washington  
corporation,

5  
6 Defendants.

7 Plaintiff requests that defendant LCY TRUST answer the following  
8 interrogatories within thirty (30) days of service in accordance with  
9 Fed. R. Civ. P. 33. These interrogatories seek all information available to the  
10 responding party, whether such information is within the responding party's  
11 personal possession or held by accountants, lawyers, banks or other accessible  
12 sources.  
13

#### 14 DEFINITIONS

15 As used in these interrogatories, the following words and phrases  
16 shall have the following meanings:  
17

18 A. Identify. "Identify," when used in reference to a person,  
19 means to state that person's full name, most recent business and residence  
20 address, and most recent business title.  
21

22 B. Identify. "Identify," when used in reference to an entity,  
23 means to state the complete name and address of the entity, together with the  
24 names and titles of any representatives of the entity known to you.  
25

26 C. Or. The term "or" should not be read to eliminate any part of

1 any request but, whenever possible, should be used in the sense that the phrase  
2 "and/or" is normally used.

3 D. Relating. A communication or document "relating" to any  
4 given subject means any communication or document that constitutes, contains,  
5 embodies, reflects, identifies, states, refers to, deals with, or is in any way  
6 pertinent to that subject, including, without limitation, documents concerning the  
7 preparation of other documents.  
8

9 E. Defendant Mastro Entities. "Defendant Mastro Entities"  
10 means the Mastro Revocable Living Trust, the Mastro Irrevocable Trust, the LCY  
11 Trust, LCY LLC, LCY LLC - Series Home, LCY LLC - Series Jewelry, and LCY  
12 LLC - Series Automobiles.  
13

14 F. Compass Entity. "Compass Entity" means Compass Trust  
15 Corporation, Compass S.A., Compass Group International, Compass Group  
16 Corporate Services, Compass Group Belize, Compass NorthAmerica, Compass  
17 Insurance Managers, or any affiliated person or entity.  
18

19 **INTERROGATORIES**

20 INTERROGATORY NO. 1: Provide a detailed statement of all of the  
21 current assets and liabilities of the LCY TRUST, including all account names and  
22 numbers.  
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24 RESPONSE:  
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INTERROGATORY NO. 2: Identify the custodian of each asset of the LCY TRUST.

RESPONSE:

INTERROGATORY NO. 3: Provide complete information regarding the location of each asset of the LCY TRUST.

RESPONSE:

INTERROGATORY NO. 4: Provide a complete list of all transfers of assets into and out of the LCY TRUST from the time the trust was formed to the present, including the date of the transfer, a description of the asset, its estimated value, the identity of the transferor, and the identity of the transferee.

RESPONSE:

INTERROGATORY NO. 5: Identify all past and present trustees of the LCY TRUST, including the dates during which each trustee served as trustee.

RESPONSE:

INTERROGATORY NO. 6: Identify all past and present Protectors of the LCY TRUST, including the dates during which each Protector served as

1 Protector.

2 RESPONSE:

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INTERROGATORY NO. 7: To the extent not identified in response to preceding interrogatories, identify all persons and entities who at any time have had authority to act on behalf of the LCY TRUST, or to make or veto decisions on behalf of the LCY TRUST, whether acting alone or in concert with other persons or entities, including the dates during which such authority was held.

RESPONSE:

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INTERROGATORY NO. 8: Provide a list of all attorneys who have represented the LCY TRUST from the date the trust was formed until the present, including the dates during which each attorney represented the trust.

RESPONSE:

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INTERROGATORY NO. 9: State the source of all payments made to each attorney who has represented the LCY TRUST, including counsel of record in this litigation.

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INTERROGATORY NO. 10: Provide a list of all insurance policies for which the LCY TRUST is a named insured or beneficiary.


RESPONSE:

INTERROGATORY NO. 11: Provide a complete list of all payments made by or at the direction of the LCY TRUST for the benefit of Michael R. Mastro, Linda A. Mastro, or any of the Defendant Mastro Entities.

RESPONSE:

DATED this 4<sup>th</sup> day of February, 2010.

HALL ZANZIG CLAFLIN  
McEACHERN PLLC

By   
Spencer Hall, WSBA No. 6162  
Janet D. McEachern, WSBA No. 14450

BUSH STROUT & KORNFELD  
Gayle E. Bush, WSBA No. 7318  
Christine M. Tobin, WSBA No. 27628

Attorneys for Plaintiff James F. Rigby, Jr., Chapter 7 Trustee of the Bankruptcy Estate of Michael R. Mastro

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ANSWERS dated this \_\_\_\_\_ day of March, 2010.

DAVIS WRIGHT TREMAINE LLP

By \_\_\_\_\_  
Richard J. Schroeder, WSBA No. 11958  
Attorneys for Defendant LCY Trust

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VERIFICATION

STATE OF WASHINGTON     )  
  )  
COUNTY OF KING         )     ss.

\_\_\_\_\_ , being first duly sworn on  
oath, deposes and says:

That he/she is the \_\_\_\_\_ of LCY TRUST, and is  
authorized to verify answers to interrogatories herein; and that he/she has read  
the foregoing answers to Plaintiff's First Interrogatories to the LCY TRUST, knows  
the contents thereof, and believes the same to be true.

\_\_\_\_\_  
SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of March,  
2010.

\_\_\_\_\_  
(Signature of Notary)

\_\_\_\_\_  
(Printed Name)

Notary Public in and for the State of  
Washington, residing at \_\_\_\_\_  
My Commission expires: \_\_\_\_\_

Honorable Samuel J. Steiner

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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE:

MICHAEL R. MASTRO,  
  
Debtor.

BANKRUPTCY NO. 09-16841 (Ch. 7)

JAMES F. RIGBY, JR., Trustee, solely in  
his capacity as Chapter 7 trustee of the  
bankruptcy estate of Michael R. Mastro,

Plaintiff,

ADVERSARY CASE NO. 09-01439-SJS

PLAINTIFF'S FIRST  
INTERROGATORIES TO  
COMPASS TRUST CORPORATION

v.

MICHAEL R. MASTRO and LINDA A.  
MASTRO; MICHAEL K. MASTRO and  
JANE DOE MASTRO, husband and wife  
and the marital community composed  
thereof; LCY, LLC, a Delaware limited  
liability corporation; MASTRO  
REVOCABLE LIVING TRUST; MASTRO  
IRREVOCABLE TRUST; LCY, LLC-  
SERIES HOMES; LCY, LLC-SERIES  
JEWELRY; LCY, LLC-SERIES  
AUTOMOBILES; THE LCY TRUST, a  
trust purported to be formed in Belize;  
COMPASS TRUST CORPORATION, a

1 trust of unknown origin using an address  
2 in Belize City, Belize; COMPASS S.A.;  
3 CONCEPT DORSSERS, a purported  
4 Monaco company; and FOUNDATION  
MANAGEMENT INC., a Washington  
corporation,

5  
6 Defendants.

7 Plaintiff requests that defendant COMPASS TRUST  
8 CORPORATION ("Compass Trust") answer the following interrogatories within  
9 thirty (30) days of service in accordance with Fed. R. Civ. P. 33. These  
10 interrogatories seek all information available to the responding party, whether  
11 such information is within the responding party's personal possession or held by  
12 accountants, lawyers, banks or other accessible sources.  
13

#### 14 DEFINITIONS

15 As used in these interrogatories, the following words and phrases  
16 shall have the following meanings:  
17

18 A. Identify. "Identify," when used in reference to a person,  
19 means to state that person's full name, most recent business and residence  
20 address, and most recent business title.  
21

22 B. Identify. "Identify," when used in reference to an entity,  
23 means to state the complete name and address of the entity, together with the  
24 names and titles of any representatives of the entity known to you.  
25

26 C. Or. The term "or" should not be read to eliminate any part of

1 any request but, whenever possible, should be used in the sense that the phrase  
2 "and/or" is normally used.

3 D. Relating. A communication or document "relating" to any  
4 given subject means any communication or document that constitutes, contains,  
5 embodies, reflects, identifies, states, refers to, deals with, or is in any way  
6 pertinent to that subject, including, without limitation, documents concerning the  
7 preparation of other documents.

8 E. Defendant Mastro Entities. "Defendant Mastro Entities"  
9 means the Mastro Revocable Living Trust, the Mastro Irrevocable Trust, the LCY  
10 Trust, LCY LLC, LCY LLC - Series Home, LCY LLC - Series Jewelry, and LCY  
11 LLC - Series Automobiles.

12 F. Compass Entity. "Compass Entity" means Compass Trust  
13 Corporation, Compass S.A., Compass Group International, Compass Group  
14 Corporate Services, Compass Group Belize, Compass NorthAmerica, Compass  
15 Insurance Managers, or any affiliated person or entity.

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20 **INTERROGATORIES**

21 **INTERROGATORY NO. 1:** Provide a detailed statement of all of the  
22 current assets and liabilities of the LCY TRUST, including all account names and  
23 numbers.

24 **RESPONSE:**

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INTERROGATORY NO. 2: Identify the custodian of each asset of the LCY TRUST.

RESPONSE:

INTERROGATORY NO. 3: Provide complete information regarding the location of each asset of the LCY TRUST.

RESPONSE:

INTERROGATORY NO. 4: Provide a complete list of all transfers of assets into and out of the LCY TRUST from the time the trust was formed to the present, including the date of the transfer, a description of the asset, its estimated value, the identity of the transferor, and the identity of the transferee.

RESPONSE:

INTERROGATORY NO. 5: Identify all past and present trustees of the LCY TRUST, including the dates during which each trustee served as trustee.

RESPONSE:

INTERROGATORY NO. 6: Identify all past and present Protectors of the LCY TRUST, including the dates during which each Protector served as

1 Protector.

2 RESPONSE:

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INTERROGATORY NO. 7: Identify all past and present members of any Advisory Committee for the Protector of the LCY TRUST, including the dates during which each such Advisory Committee member served.

RESPONSE:

INTERROGATORY NO. 8: To the extent not identified in response to the preceding interrogatory, identify all persons and entities who at any time have had authority to act on behalf of the LCY TRUST, or to make or veto decisions on behalf of the LCY TRUST, whether acting alone or in concert with other persons or entities, including the dates during which such authority was held.

RESPONSE:

INTERROGATORY NO. 9: Provide a list of all attorneys who have represented the LCY TRUST from the date the trust was formed until the present, including the dates during which each attorney represented the trust.

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RESPONSE:

INTERROGATORY NO. 10: State the source of all payments made to counsel of record for the LCY TRUST in this litigation.

RESPONSE:

INTERROGATORY NO. 11: Provide a complete list of all payments made by or at the direction of the LCY TRUST for the benefit of Michael R. Mastro, Linda A. Mastro, or any of the Defendant Mastro Entities.

RESPONSE:

INTERROGATORY NO. 12: Identify all persons and entities who at any time have had an ownership interest in Compass Trust, including the dates during which such ownership interest was held.

RESPONSE:

INTERROGATORY NO. 13: Identify all past and present employees of Compass Trust, including the dates of employment.

RESPONSE:

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INTERROGATORY NO. 14: Identify all past and present officers of  
Compass Trust, including the dates each position was held.

RESPONSE:

INTERROGATORY NO. 15: Identify all past and present directors of  
Compass Trust, including the dates each person was a director.

RESPONSE:

INTERROGATORY NO. 16: To the extent not identified in response  
to preceding interrogatories, identify all persons and entities who at any time have  
had authority to act on behalf of Compass Trust, or to make or veto decisions on  
behalf of Compass Trust, whether acting alone or in concert with other persons or  
entities, including the dates during which such authority was held.

RESPONSE:

INTERROGATORY NO. 17: Provide a list of all transactions  
involving contacts with the State of Washington to which Compass Trust has been  
a party or in which Compass Trust has had some other role, including the date of  
the transaction, the identities of all parties to the transaction, and the nature of the  
transaction. (For purposes of this interrogatory, any transaction involving a

1 person residing in the State of Washington or any asset located in the State of  
2 Washington shall be deemed a transaction involving contacts with the State of  
3 Washington. Compass Trust shall be deemed to have had a role in a transaction if  
4 Compass Trust approved the transaction as a principal, as a trustee, as an officer,  
5 as a director, or as an agent or was involved in any other way whatsoever.)  
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7 RESPONSE:  
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10 INTERROGATORY NO. 18: To the extent not identified in response  
11 to the preceding interrogatory, provide a list of all transactions involving contacts  
12 with the United States to which Compass Trust has been a party or in which  
13 Compass Trust has had some other role, including the date of the transaction, the  
14 identities of all parties to the transaction, and the nature of the transaction. (For  
15 purposes of this interrogatory, any transaction involving a person residing in the  
16 United States or any asset located in the United States shall be deemed a  
17 transaction involving contacts with the United States. Compass Trust shall be  
18 deemed to have had a role in a transaction if Compass Trust approved the  
19 transaction as a principal, as a trustee, as an officer, as a director, or as an agent or  
20 was involved in any other way whatsoever.)  
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24 RESPONSE:  
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1                   INTERROGATORY NO. 19: Provide a list of all assets located in the  
2 State of Washington with respect to which Compass Trust has any authority or  
3 control, whether as owner, trustee, Protector or otherwise, including the owner(s)  
4 of each asset, its location, and the dates during which Compass Trust has held  
5 such authority or control. (This interrogatory includes, but is not limited to,  
6 arrangements where Compass Trust has the ability to exercise control indirectly  
7 through another entity - *e.g.*, the control that Compass Trust asserts over the  
8 Defendant Mastro Entities and the Mastro residence through Compass Trust's role  
9 in the LCY TRUST.)  
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12                   RESPONSE:  
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15                   INTERROGATORY NO. 20: To the extent not identified in response  
16 to the preceding interrogatory, provide a list of all assets located in the United  
17 States with respect to which Compass Trust has any authority or control, whether  
18 as owner, trustee, Protector or otherwise, including the owner(s) of each asset, its  
19 location, and the dates during which Compass Trust has held such authority or  
20 control. (This interrogatory includes, but is not limited to, arrangements where  
21 Compass Trust has the ability to exercise control indirectly through another  
22 entity - *e.g.*, the control that Compass Trust asserts over the Defendant Mastro  
23 Entities and the Mastro residence through Compass Trust's role in the LCY  
24 TRUST.)  
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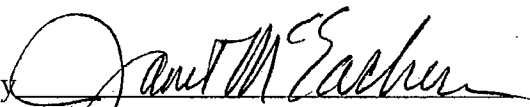
RESPONSE:

INTERROGATORY NO. 21: Provide a list of every transaction in which William Vigal or Mary Simon has acted as an officer, director, or agent of Compass Trust, including the date of the transaction, the identities of all parties to the transaction, and the nature of the transaction.

RESPONSE:

DATED this 4<sup>th</sup> day of February, 2010.

HALL ZANZIG CLAFLIN  
McEACHERN PLLC

By   
Spencer Hall, WSBA No. 6162  
Janet D. McEachern, WSBA No. 14450

BUSH STROUT & KORNFIELD  
Gayle E. Bush, WSBA No. 7318  
Christine M. Tobin, WSBA No. 27628

Attorneys for Plaintiff James F.  
Rigby, Jr., Chapter 7 Trustee of  
the Bankruptcy Estate of Michael R.  
Mastro

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ANSWERS dated this \_\_\_\_\_ day of March, 2010.

DAVIS WRIGHT TREMAINE LLP

By \_\_\_\_\_  
Richard J. Schroeder, WSBA No. 11958  
Attorneys for Defendant Compass  
Trust Corporation

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VERIFICATION

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF KING )

\_\_\_\_\_ , being first duly sworn on

oath, deposes and says:

That he/she is the \_\_\_\_\_ of Compass Trust Corporation, and is authorized to verify answers to interrogatories herein; and that he/she has read the foregoing answers to Plaintiff's First Interrogatories to Compass Trust Corporation knows the contents thereof, and believes the same to be true.

\_\_\_\_\_

SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of March, 2010.

\_\_\_\_\_  
(Signature of Notary)

\_\_\_\_\_  
(Printed Name)

Notary Public in and for the State of Washington, residing at \_\_\_\_\_  
My Commission expires: \_\_\_\_\_

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Honorable Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE:

MICHAEL R. MASTRO,  
  
Debtor.

BANKRUPTCY NO. 09-16841 (Ch. 7)

JAMES F. RIGBY, JR., Trustee, solely in  
his capacity as Chapter 7 trustee of the  
bankruptcy estate of Michael R. Mastro,

Plaintiff,

ADVERSARY CASE NO. 09-01439-SJS

PLAINTIFF'S FIRST  
INTERROGATORIES TO  
COMPASS S.A.

v.

MICHAEL R. MASTRO and LINDA A.  
MASTRO; MICHAEL K. MASTRO and  
JANE DOE MASTRO, husband and wife  
and the marital community composed  
thereof; LCY, LLC, a Delaware limited  
liability corporation; MASTRO  
REVOCABLE LIVING TRUST; MASTRO  
IRREVOCABLE TRUST; LCY, LLC-  
SERIES HOMES; LCY, LLC-SERIES  
JEWELRY; LCY, LLC-SERIES  
AUTOMOBILES; THE LCY TRUST, a  
trust purported to be formed in Belize;  
COMPASS TRUST CORPORATION, a

1 trust of unknown origin using an address  
2 in Belize City, Belize; COMPASS S.A.;  
3 CONCEPT DORSSERS, a purported  
4 Monaco company; and FOUNDATION  
MANAGEMENT INC., a Washington  
corporation,

5  
6 Defendants.

7 Plaintiff requests that defendant COMPASS S.A. answer the  
8 following interrogatories within thirty (30) days of service in accordance with  
9 Fed. R. Civ. P. 33. These interrogatories seek all information available to the  
10 responding party, whether such information is within the responding party's  
11 personal possession or held by accountants, lawyers, banks or other accessible  
12 sources.  
13

#### 14 DEFINITIONS

15 As used in these interrogatories, the following words and phrases  
16 shall have the following meanings:  
17

18 A. Identify. "Identify," when used in reference to a person,  
19 means to state that person's full name, most recent business and residence  
20 address, and most recent business title.  
21

22 B. Identify. "Identify," when used in reference to an entity,  
23 means to state the complete name and address of the entity, together with the  
24 names and titles of any representatives of the entity known to you.  
25

26 C. Or. The term "or" should not be read to eliminate any part of

1 any request but, whenever possible, should be used in the sense that the phrase  
2 "and/or" is normally used.

3 D. Relating. A communication or document "relating" to any  
4 given subject means any communication or document that constitutes, contains,  
5 embodies, reflects, identifies, states, refers to, deals with, or is in any way  
6 pertinent to that subject, including, without limitation, documents concerning the  
7 preparation of other documents.  
8

9 E. Defendant Mastro Entities. "Defendant Mastro Entities"  
10 means the Mastro Revocable Living Trust, the Mastro Irrevocable Trust, the LCY  
11 Trust, LCY LLC, LCY LLC - Series Home, LCY LLC - Series Jewelry, and LCY  
12 LLC - Series Automobiles.  
13

14 F. Compass Entity. "Compass Entity" means Compass Trust  
15 Corporation, Compass S.A., Compass Group International, Compass Group  
16 Corporate Services, Compass Group Belize, Compass NorthAmerica, Compass  
17 Insurance Managers, or any affiliated person or entity.  
18

19 **INTERROGATORIES**

20 **INTERROGATORY NO. 1:** Provide a list of all attorneys who have  
21 represented Compass S.A. from the date it was formed until the present, including  
22 the dates during which each attorney represented the trust.  
23

24 **RESPONSE:**  
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1                    INTERROGATORY NO. 2: State the source of all payments made to  
2 counsel of record for Compass S.A. in this litigation.

3                    RESPONSE:  
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6                    INTERROGATORY NO. 3: Provide a complete list of all payments  
7 made by or at the direction of Compass S.A for the benefit of Michael R. Mastro,  
8 Linda A. Mastro, or the Defendant Mastro Entities.  
9

10                   RESPONSE:  
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13                   INTERROGATORY NO. 4: Identify all persons and entities who at  
14 any time have had an ownership interest in Compass S.A, including the dates  
15 during which such ownership interest was held.  
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17                   RESPONSE:  
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20                   INTERROGATORY NO. 5: Identify all past and present employees  
21 of Compass S.A, including their dates of employment.  
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23                   RESPONSE:  
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25                   INTERROGATORY NO. 6: Identify all past and present officers of  
26 Compass S.A, including the dates each position was held.

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RESPONSE:

INTERROGATORY NO. 7: Identify all past and present directors of Compass S.A, including the dates each person was a director.

RESPONSE:

INTERROGATORY NO. 8: Identify all past and present members of any Advisory Committee for the Protector of the LCY Trust, including the dates during which each such Advisory Committee member served.

RESPONSE:

INTERROGATORY NO. 9: Describe all actions taken by the Advisory Committee for the Protector of the LCY Trust from the date the LCY Trust was formed to the present date, including the date and substance of each action and the identity of each person or entity involved in each such action.

RESPONSE:

INTERROGATORY NO. 10: To the extent not identified in response to preceding interrogatories, identify all persons and entities who at any time have had authority to act on behalf of Compass S.A, or to make or veto decisions on

1 behalf of Compass S.A., whether acting alone or in concert with other persons or  
2 entities, including the dates during which such authority was held.

3 RESPONSE:

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6 INTERROGATORY NO. 11: Provide a list of all transactions  
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8 involving contacts with the State of Washington to which Compass S.A has been a  
9 party or in which Compass S.A has had some other role, including the date of the  
10 transaction, the identities of all parties to the transaction, and the nature of the  
11 transaction. (For purposes of this interrogatory, any transaction involving a  
12 person residing in the State of Washington or any asset located in the State of  
13 Washington shall be deemed a transaction involving contacts with the State of  
14 Washington. Compass S.A shall be deemed to have had a role in a transaction if  
15 Compass S.A. approved the transaction as a principal, as a trustee, as a Protector,  
16 as an officer, as a director, or as an agent or was involved in any other way  
17  
18 whatsoever.

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20 RESPONSE:

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23 INTERROGATORY NO. 12: To the extent not identified in response  
24 to the preceding interrogatory, provide a list of all transactions involving contacts  
25 with the United States to which Compass S.A has been a party or in which  
26 Compass S.A has had some other role, including the date of the transaction, the

1 identities of all parties to the transaction, and the nature of the transaction. (For  
2 purposes of this interrogatory, any transaction involving a person residing in the  
3 United States or any asset located in the United States shall be deemed a  
4 transaction involving contacts with the United States. Compass S.A shall be  
5 deemed to have had a role in a transaction if Compass S.A. approved the  
6 transaction as a principal, as a trustee, as a Protector, as an officer, as a director, or  
7 as an agent or was involved in any other way whatsoever.)  
8

9 RESPONSE:  
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13 INTERROGATORY NO. 13: Provide a list of all assets located in the  
14 State of Washington with respect to which Compass S.A has any authority or  
15 control, whether as owner, trustee, Protector or otherwise, including the owner(s)  
16 of each asset, its location, and the dates during which Compass S.A has held such  
17 authority or control. (This interrogatory includes, but is not limited to,  
18 arrangements where Compass S.A. has the ability to exercise control indirectly  
19 through another entity - e.g., the control that Compass S.A. asserts over the  
20 Defendant Mastro Entities and the Mastro residence through Compass S.A.'s role  
21 in LCY Trust.)  
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24 RESPONSE:  
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1                   INTERROGATORY NO. 14: To the extent not identified in response  
2 to the preceding interrogatory, provide a list of all assets located in the United  
3 States with respect to which Compass S.A has any authority or control, whether as  
4 owner, trustee, Protector or otherwise, including the owner(s) of each asset, its  
5 location, and the dates during which Compass S.A. has held such authority or  
6 control. (This interrogatory includes, but is not limited to, arrangements where  
7 Compass S.A. has the ability to exercise control indirectly through another entity -  
8 e.g., the control that Compass S.A. asserts over the Defendant Mastro Entities and  
9 the Mastro residence through Compass S.A.'s role in LCY Trust.)  
10

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12                   RESPONSE:  
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15                   INTERROGATORY NO. 15: Provide a list of every transaction in  
16 which William Vigal or Mary Simon has acted as an officer, director, or agent of  
17 Compass S.A, including the date of the transaction, the identities of all parties to  
18 the transaction, and the nature of the transaction.  
19

20                   RESPONSE:  
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23                   INTERROGATORY NO. 16: Provide a list of all transactions in any  
24 way related to Michael R. Mastro, Linda A. Mastro, or Michael K. Mastro or any of  
25 the Defendant Mastro Entities involving contacts to which Compass S.A has been a  
26 party or in which Compass S.A has had some other role, including the date of the

1 transaction, the identities of all parties to the transaction, and the nature of the  
2 transaction. (For purposes of this interrogatory, Compass S.A shall be deemed to  
3 have had a role in a transaction if Compass S.A. approved the transaction as a  
4 principal, as a trustee, as a Protector, as an officer, as a director, or as an agent or  
5 was involved in any other way whatsoever.)  
6

7 RESPONSE:

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10 DATED this 7<sup>th</sup> day of February, 2010.

11 HALL ZANZIG CLAFLIN  
12 MCEACHERN PLLC

13  
14 By 

15 Spencer Hall, WSBA No. 6162  
16 Janet D. McEachern, WSBA No. 14450

17 BUSH STROUT & KORNFELD  
18 Gayle E. Bush, WSBA No. 7318  
19 Christine M. Tobin, WSBA No. 27628

20 Attorneys for Plaintiff James F.  
21 Rigby, Jr., Chapter 7 Trustee of  
22 the Bankruptcy Estate of Michael R.  
23 Mastro

24 RESPONSES dated this \_\_\_\_\_ day of March, 2010.

25 DAVIS WRIGHT TREMAINE LLP

26 By \_\_\_\_\_  
Richard J. Schroeder, WSBA No. 11958  
Attorneys for Defendant Compass S.A.

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VERIFICATION

STATE OF WASHINGTON    )  
                                  )  
COUNTY OF KING        )     ss.

\_\_\_\_\_ , being first duly sworn on  
oath, deposes and says:

That he/she is the \_\_\_\_\_ of Compass S.A., and is  
authorized to verify answers to interrogatories herein; and that he/she has read  
the foregoing answers to Plaintiff's First Interrogatories to Compass S.A., knows  
the contents thereof, and believes the same to be true.

\_\_\_\_\_  
SUBSCRIBED AND SWORN to before me this \_\_\_\_\_ day of March,  
2010.

\_\_\_\_\_  
(Signature of Notary)

\_\_\_\_\_  
(Printed Name)

Notary Public in and for the State of  
Washington, residing at \_\_\_\_\_  
My Commission expires: \_\_\_\_\_

Honorable Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IN RE:

MICHAEL R. MASTRO,  
  
Debtor.

BANKRUPTCY NO. 09-16841 (Ch. 7)

JAMES F. RIGBY, JR., Trustee, solely in  
his capacity as Chapter 7 trustee of the  
bankruptcy estate of Michael R. Mastro,  
  
Plaintiff,

ADVERSARY CASE NO. 09-01439-SJS

NOTICE OF DEPOSITION OF  
THE LCY TRUST PURSUANT TO  
FED. R. CIV. P. 30(b)(6)

v.

MICHAEL R. MASTRO and LINDA A.  
MASTRO; MICHAEL K. MASTRO and  
JANE DOE MASTRO, husband and wife  
and the marital community composed  
thereof; LCY, LLC, a Delaware limited  
liability corporation; MASTRO  
REVOCABLE LIVING TRUST; MASTRO  
IRREVOCABLE TRUST; LCY, LLC-  
SERIES HOMES; LCY, LLC-SERIES  
JEWELRY; LCY, LLC-SERIES  
AUTOMOBILES; THE LCY TRUST, a  
trust purported to be formed in Belize;  
COMPASS TRUST CORPORATION, a  
trust of unknown origin using an address  
in Belize City, Belize; COMPASS S.A.;  
CONCEPT DORSSERS, a purported

NOTICE OF DEPOSITION OF  
THE LCY TRUST - 1  
Cause No. 09-01439-SJS

HALL ZANZIG CLAFLIN MCEACHERN  
1200 Fifth Ave., Suite 1414, Seattle, WA 98101 206.292.6900

1 Monaco company; and FOUNDATION  
2 MANAGEMENT INC., a Washington  
3 corporation,

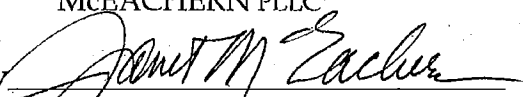
4 Defendants.

5  
6 Please take notice that the deposition of The LCY Trust will be taken  
7 upon oral examination at the request of plaintiff in the above-entitled action, before a  
8 Notary Public, at the offices of Hall Zanzig Claflin McEachern PLLC, 1200 Fifth  
9 Avenue, Suite 1414, Seattle, Washington 98101 on Thursday, February 25, 2010,  
10 commencing at 9:00 a.m., the said oral examination to be subject to continuance or  
11 adjournment from time to time or place to place until completed.  
12

13 Pursuant to Fed. R. Civ. P. 30(b)(6), The LCY Trust is requested to  
14 designate a person or persons to testify on its behalf regarding the topics listed on  
15 the attached Exhibit A.  
16

17 DATED this 12<sup>th</sup> day of February, 2010.

18 HALL ZANZIG CLAFLIN  
19 McEACHERN PLLC

20 By   
21 Spencer Hall, WSB No. 6162  
22 Janet D. McEachern, WSB No. 14450

23 BUSH STROUT & KORNFELD  
24 Gayle E. Bush, WSB No. 7318  
25 Christine M. Tobin, WSB No. 27628

26 Attorneys for Plaintiff James F.  
Rigby, Jr., Chapter 7 Trustee of  
the Bankruptcy Estate of Michael R.  
Mastro

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**EXHIBIT A**

**Deposition Topics**

1. The location and organization of all records and files in the possession or under the control of The LCY Trust (whether maintained in paper, electronic or other format).

2. All steps taken by The LCY Trust to assure that documents relevant to the matters in dispute in this adversary proceeding have been and are being preserved.

3. All information in the possession or control of The LCY Trust regarding Michael R. Mastro, any entity in which he has an interest, or any asset of Mr. Mastro or such entities.

4. All information in the possession or control of The LCY Trust regarding Linda A. Mastro, any entity in which she has an interest, or any asset of Mrs. Mastro or such entities.

5. All information in the possession or control of The LCY Trust regarding Michael K. Mastro, any entity in which he has an interest, or any asset of Mr. Mastro or such entities.

6. All information in the possession or control of The LCY Trust regarding the Mastro Irrevocable Trust and any asset owned or formerly owned by the trust.

7. All information in the possession or control of The LCY Trust

1 regarding LCY LLC, LCY LLC - Series Home, LCY LLC - Series Jewelry, LCY LLC  
2 - Series Automobiles, and any asset owned or formerly owned by such entities.

3 8. All information in the possession or control of The LCY Trust  
4 regarding any of the following entities: Compass Trust Corporation, Compass  
5 S.A., Compass Group International, Compass Group Corporate Services, Compass  
6 Group Belize, Compass NorthAmerica, Compass Insurance Managers, or any  
7 affiliated person or entity.  
8

9 9. The creation of The LCY Trust.

10 10. All amendments or revisions to The LCY Trust.

11 11. All persons or entities holding an ownership interest in The  
12 LCY Trust.  
13

14 12. All employees of The LCY Trust.

15 13. All beneficiaries of The LCY Trust.

16 14. All Trustees of The LCY Trust.

17 15. All Protectors of The LCY Trust.

18 16. All Advisory Committees for the Protector of The LCY Trust.

19 17. All efforts to implement the powers held by the Trustee under  
20 The LCY Trust.  
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22 18. All transactions involving The LCY Trust from the date of its  
23 formation to the present.  
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25 19. All assets of The LCY Trust.  
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20. All banking records of The LCY Trust.

21. The source and amount of all funds received by The LCY Trust from the date of its formation to the present.

22. The amount, recipient and reason for all payments made from The LCY Trust from the date of its formation to the present.

23. All current or former assets of Michael R. Mastro.