

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND

In re: Cumberland Investment
Corporation
Debtor(s)

Bk no. 89-11051
Chapter 7

PETITIONER'S MOTION TO COMPEL PRODUCTION OF
REQUESTED DOCUMENTS FROM CHAPTER 7 TRUSTEE

Now comes Warren D. Taft, Petitioner in the above captioned matter and requests that the court COMPEL PRODUCTION OF DOCUMENTS FROM CHAPTER 7 TRUSTEE, and states for cause the following:

1. Petitioner on March 9, 2000 filed PETITIONER'S REQUEST FOR CLARIFICATION OF ESTATE PROPERTY SOLD ON DECEMBER 7, 1999 BY SPINK AMERICA.
2. On April 6, 2000, a hearing was held in Bankruptcy Court concerning the December 7, 1999 Spink Sale.
3. At said hearing, the court encouraged Mr. Monzack to cooperate with the investigation of Petitioner.
4. On April 20, 2000, I sent a letter to Mr. Monzack requesting the letter that he sent to Christies and their response concerning the coin by coin breakdown of the 1128 silver dollars and the additional 500 or so coins that were in this auction. In addition I asked for additional documents that

should be in the possession of Mr. Monzack.

5. Since I received no response from Mr. Monzack, I sent a follow-up letter dated June 7, 2000, which included some other inquiries based upon the statements made by Mr. Monzack at the April 6, 2000 hearing. To date I have received no response.

6. On June 24, 2000, I received Mr. Chorney's motion for production of documents and videotapes.

7. Upon information and belief, Mr. Monzack has videotapes and other documents in his possession that he received from the U.S. Attorney after the criminal matter was completed.

8. In a May 17, 1995 letter from Mr. Monzack concerning "the chain of custody for Debtor's assets from the time those assets were taken into the possession of the Chapter 11 Trustee to today" was sent to various parties including the U.S. Attorney. (See Attached Exhibit.)

9. Some of the requested documents contained in this May 17, 1995 letter include:

- a. All inventories taken by Per Baverstam and/or Cambridge Meridian Group
- b. Videos of appraisals done at Eastland Bank in Cranston.

c. Documents regarding the private sale offer for 31,000 silver dollars and other assets completed by Russell Kaye, consultant to Christies.

d. Any and all inventories taken by the Examiner, including any inventories in long-hand and any computer inventories.

10. Petitioner in 1995 reviewed the videotapes of the removal of the assets from the premises of Cumberland Investment Corporation, however the items listed above were not produced as ordered by the court and I was told that all the items that they had were produced.

Wherefore, Petitioner requests that the court Compel the production of the documents requested in the letters dated April 20, 2000, June 7, 2000, and to supply Petitioner with documents in his possession that are listed in the May 17, 1995 letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Warren D. Taft', with a large, stylized flourish extending to the right.

Warren D. Taft
P.O. Box 52
Mendon, MA 01756
508 473-2846

CERTIFICATION

28th I hereby certify that a true copy of the above was sent on this day of November 2000 by first class mail to the following:

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Warren D. Taft