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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

CURTIS PETERSON, ERIC MAHER,  
RONALD WHITE, and EXPRESS  
INTERNATIONAL, LLC,

Defendants,

and

CURTIS INTERNATIONAL  
EXPRESS, INC. and ANN SCOTT,

Relief Defendants.

Case No. CV 11-1143 ODW (JEMx)

**AMENDED  
ORDER ACCEPTING REPORT  
AND RECOMMENDATION OF  
MAGISTRATE JUDGE JOHN E.  
MCDERMOTT RE ISSUANCE OF  
ORDER OF CIVIL CONTEMPT AS  
TO JUDGMENT DEBTORS CURTIS  
PETERSON AND ANN SCOTT**

**POST-JUDGMENT DISCOVERY  
MATTER**

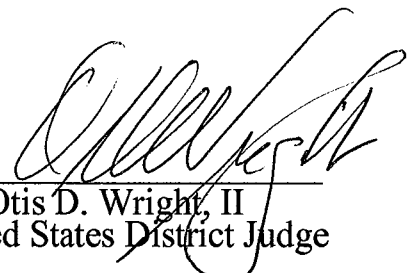
1 Pursuant to 28 U.S.C. § 636(b)(1)(6), the Court has reviewed the record of  
2 this action and the Report and Recommendation of Magistrate Judge John E.  
3 McDermott (the "Report"). Finding that good cause exists therefore, the Court  
4 accepts and adopts the findings of fact, conclusions of law, and recommendations  
5 contained in the Report. Therefore, an Order of Contempt shall issue as to each of  
6 Defendant and Judgment Debtor Curtis Peterson and Relief Defendant and  
7 Judgment Debtor Ann Scott, providing that:

8 Per diem fines of \$500.00 shall be assessed against each of Peterson and  
9 Scott until such time that each of them provides written responses, without  
10 objections, to the Interrogatories previously served upon them on March 2, 2012,  
11 true and correct copies of which are attached hereto as Exhibits A and B,  
12 respectively; and

13 If, after 14 days of issuance of this Order, either Peterson or Scott has failed  
14 to respond to said Interrogatories, an order shall issue for his and/or her arrest.

15 IT IS SO ORDERED.

16  
17 Dated: 4-23-, 2013

  
\_\_\_\_\_  
Otis D. Wright, II  
United States District Judge

# EXHIBIT A

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1 PETER F. DEL GRECO, Cal. Bar No. 164925  
E-mail: [delgreco@sec.gov](mailto:delgreco@sec.gov)

2 Attorney for Plaintiff  
3 Securities and Exchange Commission  
4 Rosalind R. Tyson, Regional Director  
5 Michele Wein Layne, Associate Regional Director  
6 John W. Berry, Regional Trial Counsel  
7 5670 Wilshire Boulevard, 11th Floor  
8 Los Angeles, California 90036  
9 Telephone: (323) 965-3998  
10 Facsimile: (323) 965-3908

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

CURTIS PETERSON, ERIC MAHER,  
RONALD WHITE, and EXPRESS  
INTERNATIONAL, LLC,

Defendants,

and

CURTIS INTERNATIONAL  
EXPRESS, INC. and ANN SCOTT,

Relief Defendants.

Case No. CV 11-1143 ODW (JEMx)

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S  
FIRST SET OF  
INTERROGATORIES TO  
DEFENDANT AND JUDGMENT  
DEBTOR CURTIS PETERSON**

**PROPOUNDING PARTY: Plaintiff Securities and Exchange Commission**

**RESPONDING PARTY: Defendant Curtis Peterson**

**SET NUMBER: One (1)**

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Plaintiff Securities and Exchange Commission ("Commission") hereby  
3 respectfully requests that Defendant and Judgment Debtor Curtis Peterson answer  
4 the following Interrogatories within 30 days of service hereof under Rule 33, Fed.  
5 R. Civ. P. and Local Rules 33-1 through 33-3.

6 **Definitions**

7 In connection with these Interrogatories, the terms used herein shall have the  
8 following meanings and interpretations:

9 A. "You" and "Your", as used herein, shall refer to Curtis Peterson, an  
10 individual, and to any and all entities which he controls, including, without  
11 limitation, Express International, LLC and Curtis International Express, Inc.

12 **Interrogatories**

13 **Interrogatory No. 1:**

14 Identify (provide the account name, the account number, and the name of the  
15 financial institution) all bank and brokerage accounts held in your name, on your  
16 behalf, or otherwise under your control, at present or at any time since September  
17 2009.

18 **Interrogatory No. 2:**

19 Identify (provide the street address, city and state) all parcels of real property  
20 held in your name, on your behalf, or otherwise under your control, at present or at  
21 any time since September 2009.

22 **Interrogatory No. 3:**

23 Identify (provide the name and account number) all mortgagors to whom  
24 you have made a payment or payments at any time since September 2009,  
25 including, without limitation:

- 26 ○ Payments made to Chase Bank; and  
27 ○ Payments made to Home Savings of America.

28 **Interrogatory No. 4.**

1 Identify (provide the name, address and telephone number) all persons and  
2 entities to whom you have provided a cumulative amount of more than \$1,000  
3 since July 2010.

4 **Interrogatory No. 5:**

5 Identify (provide make, model and Vehicle Identification Number) all motor  
6 vehicles which you have purchased or to which you have contributed toward  
7 purchase, in whole or in part, at any time since September 2009, including, without  
8 limitation:

- 9 ○ A vehicle purchased from Rancho Valley Chevrolet on or about  
10 September 21, 2009;
- 11 ○ A vehicle purchased from Team Chevrolet on or about November 19,  
12 2009;
- 13 ○ A vehicle purchased from Galpin Ford on or about December 23,  
14 2009;
- 15 ○ A 2010 Chevrolet Coupe; and
- 16 ○ A 2005 Chrysler sedan on which WSF Financial Services is or was a  
17 lienholder.

18 **Interrogatory No. 6:**

19 Identify (provide the name and address) all primary users of the vehicles  
20 identified in your response to Interrogatory No. 5.

21 **Interrogatory No. 7:**

22 Identify (provide name, address and phone number) all persons and entities  
23 who or which have provided you with a paycheck, commission, finder's fee, or  
24 other form of monetary compensation for services rendered at any time since July  
25 2010.

26 **Interrogatory No. 8:**

27 Describe the services you provided in connection with the compensation  
28 identified in your response to Interrogatory No. 7.

1 DATED: March 2, 2012

2 Respectfully submitted,

3 /s/ Peter F. Del Greco  
4 Peter F. Del Greco  
5 Attorney for Plaintiff  
6 Securities and Exchange Commission  
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1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to this action. My business address is:

3  U.S. SECURITIES AND EXCHANGE COMMISSION, 5670 Wilshire  
4 Boulevard, 11th Floor, Los Angeles, California 90036-3648

5 Telephone No. (323) 965-3998; Facsimile No. (323) 965-3908.

6 On March 2, 2012 I caused to be served the document entitled **PLAINTIFF**  
7 **SECURITIES AND EXCHANGE COMMISSION'S FIRST SET OF**  
8 **INTERROGATORIES TO DEFENDANT AND JUDGMENT DEBTOR**  
9 **CURTIS PETERSON** on all the parties to this action addressed as stated on the  
10 attached service list:

11  **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for  
12 collection and mailing today following ordinary business practices. I am  
13 readily familiar with this agency's practice for collection and processing of  
14 correspondence for mailing; such correspondence would be deposited with  
15 the U.S. Postal Service on the same day in the ordinary course of business.

16  **PERSONAL DEPOSIT IN MAIL:** By placing in sealed  
17 envelope(s), which I personally deposited with the U.S. Postal Service.  
18 Each such envelope was deposited with the U.S. Postal Service at Los  
19 Angeles, California, with first class postage thereon fully prepaid.

20  **EXPRESS U.S. MAIL:** Each such envelope was deposited in a  
21 facility regularly maintained at the U.S. Postal Service for receipt of  
22 Express Mail at Los Angeles, California, with Express Mail postage  
23 paid.

24  **HAND DELIVERY:** I caused to be hand delivered each such envelope to  
25 the office of the addressee as stated on the attached service list.

26  **UNITED PARCEL SERVICE:** By placing in sealed envelope(s)  
27 designated by United Parcel Service ("UPS") with delivery fees paid or  
28 provided for, which I deposited in a facility regularly maintained by UPS or  
delivered to a UPS courier, at Los Angeles, California.

**ELECTRONIC MAIL:** By transmitting the document by electronic mail  
to the electronic mail address as stated on the attached service list.

**E-FILING:** By causing the document to be electronically filed via the  
Court's CM/ECF system, which effects electronic service on counsel who  
are registered with the CM/ECF system.

**FAX:** By transmitting the document by facsimile transmission. The  
transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

27 Date: March 2, 2012

/s/ Peter F. Del Greco  
Peter F. Del Greco





# **EXHIBIT B**

---

1 PETER F. DEL GRECO, Cal. Bar No. 164925  
E-mail: [delgreco@sec.gov](mailto:delgreco@sec.gov)

2 Attorney for Plaintiff  
3 Securities and Exchange Commission  
Rosalind R. Tyson, Regional Director  
4 Michele Wein Layne, Associate Regional Director  
John W. Berry, Regional Trial Counsel  
5 5670 Wilshire Boulevard, 11th Floor  
Los Angeles, California 90036  
6 Telephone: (323) 965-3998  
Facsimile: (323) 965-3908  
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9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 SECURITIES AND EXCHANGE  
12 COMMISSION,

13 Plaintiff,

14 vs.

15 CURTIS PETERSON, ERIC MAHER,  
RONALD WHITE, and EXPRESS  
INTERNATIONAL, LLC,

16 Defendants,

17 and

18 CURTIS INTERNATIONAL  
19 EXPRESS, INC. and ANN SCOTT,

20 Relief Defendants.  
21

Case No. CV 11-1143 ODW (JEMx)

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION'S  
FIRST SET OF  
INTERROGATORIES TO RELIEF  
DEFENDANT AND JUDGMENT  
DEBTOR ANN SCOTT**

22  
23 **PROPOUNDING PARTY: Plaintiff Securities and Exchange Commission**

24 **RESPONDING PARTY: Relief Defendant Ann Scott**

25 **SET NUMBER: One (1)**  
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1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Plaintiff Securities and Exchange Commission (“Commission”) hereby  
3 respectfully requests that Relief Defendant and Judgment Debtor Ann Scott answer  
4 the following Interrogatories within 30 days of service hereof under Rule 33, Fed.  
5 R. Civ. P. and Local Rules 33-1 through 33-3.

6 **Definitions**

7 In connection with these Interrogatories, the terms used herein shall have the  
8 following meanings and interpretations:

9 A. “You” and “Your”, as used herein, shall refer to Ann Scott, an  
10 individual, and to any and all entities which she controls, including, without  
11 limitation, Express International, LLC.

12 **Interrogatories**

13 **Interrogatory No. 1:**

14 Identify (provide the account name, the account number, and the name of the  
15 financial institution) all bank and brokerage accounts held in your name, on your  
16 behalf, or otherwise under your control, at present or at any time since September  
17 2009.

18 **Interrogatory No. 2:**

19 Identify (provide the street address, city and state) all parcels of real property  
20 held in your name, on your behalf, or otherwise under your control, at present or at  
21 any time since September 2009.

22 **Interrogatory No. 3:**

23 Identify (provide the name and account number) all mortgagors to whom  
24 you have made a payment or payments at any time since September 2009.

25 **Interrogatory No. 4.**

26 Identify (provide the name, address and telephone number) all persons and  
27 entities to whom you have provided a cumulative amount of more than \$1,000  
28 since September 2009.

1 **Interrogatory No. 5:**

2 Identify (provide make, model and Vehicle Identification Number) all motor  
3 vehicles which you have purchased or to which you have contributed toward  
4 purchase, in whole or in part, at any time since September 2009.

5 **Interrogatory No. 6:**

6 Identify (provide the name and address) all primary users of the vehicles  
7 identified in your response to Interrogatory No. 5.

8 **Interrogatory No. 7:**

9 Identify (provide name, address and phone number) all persons and entities  
10 who or which have provided you with a paycheck, commission, finder's fee, or  
11 other form of monetary compensation for services rendered at any time since  
12 September 2009.

13 **Interrogatory No. 8:**

14 Describe the services you provided in connection with the compensation  
15 identified in your response to Interrogatory No. 7.

16 DATED: March 2, 2012

Respectfully submitted,

17  
18 /s/ Peter F. Del Greco  
19 Peter F. Del Greco  
20 Attorney for Plaintiff  
21 Securities and Exchange Commission  
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1 **PROOF OF SERVICE**

2 I am over the age of 18 years and not a party to this action. My business address is:

3  U.S. SECURITIES AND EXCHANGE COMMISSION, 5670 Wilshire  
4 Boulevard, 11th Floor, Los Angeles, California 90036-3648

5 Telephone No. (323) 965-3998; Facsimile No. (323) 965-3908.

6 On March 2, 2012 I caused to be served the document entitled **PLAINTIFF**  
7 **SECURITIES AND EXCHANGE COMMISSION'S FIRST SET OF**  
8 **INTERROGATORIES TO RELIEF DEFENDANT AND JUDGMENT**  
9 **DEBTOR ANN SCOTT** on all the parties to this action addressed as stated on the  
10 attached service list:

11  **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for  
12 collection and mailing today following ordinary business practices. I am  
13 readily familiar with this agency's practice for collection and processing of  
14 correspondence for mailing; such correspondence would be deposited with  
15 the U.S. Postal Service on the same day in the ordinary course of business.

16  **PERSONAL DEPOSIT IN MAIL:** By placing in sealed  
17 envelope(s), which I personally deposited with the U.S. Postal Service.  
18 Each such envelope was deposited with the U.S. Postal Service at Los  
19 Angeles, California, with first class postage thereon fully prepaid.

20  **EXPRESS U.S. MAIL:** Each such envelope was deposited in a  
21 facility regularly maintained at the U.S. Postal Service for receipt of  
22 Express Mail at Los Angeles, California, with Express Mail postage  
23 paid.

24  **HAND DELIVERY:** I caused to be hand delivered each such envelope to  
25 the office of the addressee as stated on the attached service list.

26  **UNITED PARCEL SERVICE:** By placing in sealed envelope(s)  
27 designated by United Parcel Service ("UPS") with delivery fees paid or  
28 provided for, which I deposited in a facility regularly maintained by UPS or  
delivered to a UPS courier, at Los Angeles, California.

**ELECTRONIC MAIL:** By transmitting the document by electronic mail  
to the electronic mail address as stated on the attached service list.

**E-FILING:** By causing the document to be electronically filed via the  
Court's CM/ECF system, which effects electronic service on counsel who  
are registered with the CM/ECF system.

**FAX:** By transmitting the document by facsimile transmission. The  
transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

27 Date: March 2, 2012

/s/ Peter F. Del Greco  
Peter F. Del Greco



**PROOF OF SERVICE**

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION, 5670 Wilshire Boulevard, 11th Floor, Los Angeles, California 90036-3648  
Telephone No. (323) 965-3998; Facsimile No. (323) 965-3908.

On March 4, 2013, I caused to be served the document entitled **NOTICE OF LODGMENT OF (1) [PROPOSED] REPORT AND RECOMMENDATION OF MAGISTRATE JUDGE JOHN E. MCDERMOTT RE ISSUANCE OF ORDER OF CIVIL CONTEMPT AS TO JUDGMENT DEBTORS CURTIS PETERSON AND ANN SCOTT AND (2) [PROPOSED] ORDER ADOPTING REPORT AND RECOMMENDATION OF MAGISTRATE JUDGE AND ISSUANCE OF ORDER OF CIVIL CONTEMPT AS TO JUDGMENT DEBTORS CURTIS PETERSON AND ANN SCOTT** on all the parties to this action addressed as stated on the attached service list:

**OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

**PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

**EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

**HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

**UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

**ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

**E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

**FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 4, 2013

/s/ Peter F. Del Greco  
Peter F. Del Greco



