

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)

Plaintiff,)

vs.)

) C.A. No. 09-470-S

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., HARRISON CONDIT,)
and FORTUNE FINANCIAL SERVICES,)
INC.,)

Defendants;)

TRANSAMERICA LIFE INSURANCE)
COMPANY,)

Plaintiff,)

vs.)

) C.A. No. 09-471-S

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., ESTELA)
RODRIGUES, EDWARD MAGGIACOMO,)
JR., LIFEMARK SECURITIES CORP., and)
PATRICK GARVEY,)

Defendants;)

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)

Plaintiff,)

vs.)

) C.A. No. 09-472-S

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., ADM ASSOCIATES,)
LLC, EDWARD HANRAHAN, THE)
LEADERS GROUP, INC., and CHARLES)
BUCKMAN,)

Defendants;)

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)
Plaintiff,)

vs.)

C.A. No. 09-473-S)

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., DK LLC, EDWARD)
HANRAHAN, THE LEADERS GROUP,)
INC., and JASON VEVEIROS,)
Defendants;)

WESTERN RESERVE LIFE ASSURANCE)
CO. OF OHIO,)
Plaintiff,)

vs.)

C.A. No. 09-502-S)

JOSEPH CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC., NATCO PRODUCTS)
CORP., EDWARD HANRAHAN, and THE)
LEADERS GROUP, INC.,)
Defendants;)

TRANSAMERICA LIFE INSURANCE)
COMPANY,)
Plaintiff,)

vs.)

C.A. No. 09-549-S)

LIFEMARK SECURITIES CORP., JOSEPH)
CARAMADRE, RAYMOUR)
RADHAKRISHNAN, ESTATE PLANNING)
RESOURCES, INC. and EDWARD)
MAGGIACOMO, JR.,)
Defendants; and)

WESTERN RESERVE LIFE ASSURANCE)	
CO. OF OHIO,)	
Plaintiff,)	
)	
vs.)	
)	C.A. No. 09-564-S
JOSEPH CARAMADRE, RAYMOUR)	
RADHAKRISHNAN, ESTATE PLANNING)	
RESOURCES, INC., HARRISON CONDIT,)	
and FORTUNE FINANCIAL SERVICES,)	
INC.,)	
Defendants.)	
)	

AFFIDAVIT PURSUANT TO LR Gen 206(e)(2)(A)

I, Robert G. Flanders, Jr., Esq., depose and state as follows:

1. I am a partner in the law firm of Hinckley, Allen & Snyder LLP (“Hinckley Allen”).

I have represented Defendants Joseph Caramadre, Raymour Radhakrishnan, Estate Planning Resources, Inc. (“EPR”), and Harrison Condit in the above-captioned matters. I submit this affidavit pursuant to LR Gen. 206(e)(2)(A) in support of the motion to withdraw as counsel to Caramadre, Radhakrishnan, EPR, and Condit filed on behalf of myself, Attorney Robert G. Flanders, Jr., Esq. and Hinckley Allen..

2. Defendant Joseph Caramadre is not a person in military service as defined in the Soldiers’ and Sailors’ Civil Relief Act, 50 App. U.S.C. § 501 et seq.

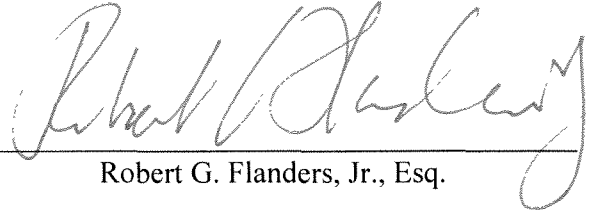
3. Defendant Raymour Radhakrishnan is not a person in military service as defined in the Soldiers’ and Sailors’ Civil Relief Act, 50 App. U.S.C. § 501 et seq.

4. Defendant EPR is a Rhode Island corporation with its last known principal place of business at 1000 Chapel View Boulevard, Suite 270, Cranston, Rhode Island, 02920.

Accordingly, EPR is not a person in military service as defined in the Soldiers’ and Sailors’ Civil Relief Act, 50 App. U.S.C. § 501 et seq.

5. Defendant Harrison Condit is not a person in military service as defined in the Soldiers' and Sailors' Civil Relief Act, 50 App. U.S.C. § 501 et seq.

SIGNED UNDER THE PENALTIES OF
PERJURY THIS 28th DAY OF MARCH, 2013.



Robert G. Flanders, Jr., Esq.

Sworn to and subscribed before me this 28th day of March, 2013



Dennis A. Salcedo