

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

WESTERN RESERVE LIFE ASSURANCE)	
COMPANY OF OHIO)	
Plaintiff,)	
)	C.A. No. 09-473/S
v.)	
)	
JOSEPH CARAMADRE, RAYMOUR)	
RADHAKRISHNAN, ESTATE PLANNING)	
RESOURCES, INC, DK LLC, EDWARD)	
HANRAHAN, THE LEADERS GROUP, INC. and)	
JASON VEVEIROS,)	
Defendants.)	

AFFIDAVIT OF LORI CHRISTY

STATE OF IOWA)
) ss:
COUNTY OF LINN)

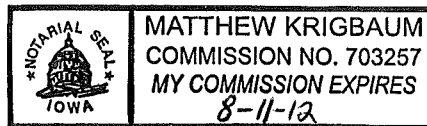
Lori Christy, being duly sworn, says:

1. I am a paralegal in the Legal/Compliance Department of Transamerica Capital Management. I am over 18 years of age. I have personal knowledge of the facts stated herein.
2. Western Reserve Life Assurance Co. of Ohio on September 9, 2008 issued Annuity Policy Number 09-01N6041113 to DK LLC. A true copy of that policy is appended to the Complaint as Exhibit D.
3. Western Reserve Life Assurance Co. of Ohio on September 23, 2009 sent the letter and check appended hereto as Exhibit A to DK LLC c/o Joseph Caramadre, Manager.
4. DK LLC on October 28, 2010 cashed the rescission check appended as Exhibit A.

Lori Christy
LORI CHRISTY

Subscribed and sworn to before me
On this 3 day of November, 2010.

Matthew Krigbaum
NOTARY PUBLIC
My Commission Expires 8-11-12



Respectfully submitted

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Michael J. Daly, Esq. No. 6729
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Western Reserve Life Assurance
Co. of Ohio
Home Office:
Columbus, Ohio
Administrative Office:
1333 Edgewood Road NE
PO Box 3183
Cedar Rapids, IA 52406-3183

September 23, 2009

DK LLC
C/O Joseph Caramadre, Esq., Manager
1000 Chapel View Blvd., Suite 270
Cranston, RI 02920

Re: Rescission of Annuity Policy Number 09-01N6041113

Dear Mr. Caramadre:

We write in connection with Annuity Policy Number 09-01N6041113 (Annuity), issued by Western Reserve Life Assurance Co. of Ohio ("Western Reserve"). The Annuity issued in the name of Mr. Jason Veveiros as the annuitant and DK LLC as the owner/beneficiary. It recently has come to our attention that the Annuity was issued based on material misrepresentations and omissions contained in the application.

Western Reserve received the application in March 2008. Mr. Veveiros's signature on the application is a representation that he knowingly and voluntarily signed the document with full understanding of all rights, duties and obligations under the Annuity. We have recently spoken with Mr. Veveiros and he denies having any such knowledge or understanding. Moreover, Mr. Veveiros denies having knowledge that he has been designated an annuitant under the contract.

The application also contains several material omissions, including the fact that at the time the application was submitted, Mr. Veveiros was terminally ill with cancer and had an extremely limited life expectancy. The application was submitted with the knowledge of Mr. Veveiros's health condition, but that information was concealed from Western Reserve.

Western Reserve also has learned that the owner and beneficiary of the Annuity, DK LLC, had no relationship with Mr. Veveiros and lacked an insurable interest in him. The Annuity therefore is void for lack of an insurable interest.

Moreover, Mr. Veveiros now informs us that he signed the application because he was paid to do so. The payment of money to Mr. Veveiros to sign the application constitutes a violation of R.I. Gen. Laws § 26-4-6 and was a material fact that was concealed from Western Reserve.

We also have learned that the authorized broker/agent who signed the application had no substantive involvement in the sale of this Annuity.

The misrepresentations and omissions described herein were material to Western Reserve's decision to issue the Annuity and actually contributed to the contingency or event upon which the death benefits under the Annuity are to become due and payable. Western Reserve would not have issued the Annuity under the terms it did and assumed the risk or hazard of such a transaction if the application provided complete and truthful information. Therefore, Western Reserve has determined that the Annuity must be rescinded.

Enclosed please find a check for \$1,000,000, which represents the premiums paid for the Annuity. Depositing or cashing this check constitutes your agreement that the Annuity is void and rescinded and is regarded as having never been in force.

Western Reserve reserves all other grounds for rescission and all other rights or remedies that are or may be available to it as a result of the issuance and rescission of the Annuity.

Respectfully,

Scott B. Manchester
Senior Attorney

CC: Jason Veveiros; Edward Hanrahan; The Leaders Group, Inc.

WESTERN RESERVE LIFE ASSURANCE CO. OF OHIO
P.O. BOX 1447
4333 EDGEWOOD ROAD NE
CEDAR RAPIDS, IA 52499 AN

CHECK NO. 04956379

BNY MELLON TRUST OF DELAWARE 62-35
NEWARK, DELAWARE 19711 311

DATE 09-24-2009
MM DD YYYY

PAY ONE MILLION DOLLARS AND NO CENTS
EXACTLY

\$**1,000,000.00

WESTERN RESERVE LIFE ASSURANCE CO

TO THE ORDER OF
DK LLC
1000 CHAPEL VIEW BLVD
SUITE 270
CRANSTON RI 02920

NON-NEGOTIABLE

NO MICR LINE ON THE CHECK COPY!

WESTERN RESERVE LIFE ASSURANCE CO. OF OHIO

DATE	INVOICE NUMBER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
09212009	01N6041113	1000000.00	0.00	1000000.00
RETURN OF PREMIUMS TO CLIENT				

CHECK NO 04956379 DATE 09242009 VENDOR NO. ADD0109807 VENDOR NAME DK LLC CHECK AMOUNT 1000000.00