

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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SECURITIES AND EXCHANGE)
COMMISSION,)

Plaintiff,)

v.)

CONCORDE AMERICA, INC., ABSOLUTE)
HEALTH AND FITNESS, INC., HARTLEY)
LORD, DONALD E. OEHMKE, BRYAN)
KOS, THOMAS M. HEYSEK, ANDREW M.)
KLINE, AND PAUL A. SPREADBURY,)

Defendants,)

DASILVA, SA, VANDERLIP HOLDINGS,)
NV, CHIANG ZE CAPITAL, AVV, RYZCEK)
INVESTMENTS, GMBH, BARRANQUILLA)
HOLDINGS, SA,)

Relief Defendants.)

CASE NO. 05-80128-CIV-ZLOCH/SNOW

**DEFENDANT DONALD E. OEHMKE'S
INITIAL DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 26(a)(1)**

COMES NOW Defendant, DONALD E. OEHMKE ("Oehmke"), by and through his undersigned counsel and in accordance with Federal Rule of Civil Procedure 26(a)(1)(A)-(D), and states:

1. Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Defendant Oehmke hereby identifies the following individuals presently known to likely have discoverable information that Oehmke may use in supporting his defenses in the present case:

(a) Stephen Kirsch, 1390 La Paloma Road, Los Altos, California 94022, a person with knowledge about the facts of this case.

(b) Wayne Kirby, Electronic Access Direct, 2055 Wood Street, Suite 102, Sarasota, Florida 34237, a person with knowledge of the facts of this case.

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(c) James Kelly, Sun State Securities, Inc., 2200 NW Corporate Blvd., Suite #100, Boca Raton, Florida 33431, a person with knowledge of the facts of this case.

(d) Warren Hansen, a person with knowledge of the facts of this case whose address is known to plaintiffs.

(e) Greg Breibart, Esq., Newbridge Securities, Inc., 1451 W. Cypress Creek Road, Suite 204, Fort Lauderdale, Florida 33309, a person with knowledge of the facts of this case.

(f) Danny Kantrowitz, Newbridge Securities, Inc., 1451 W. Cypress Creek Road, Suite 204, Fort Lauderdale, Florida 33309, a person with knowledge of the facts of this case.

(g) David Wells, Newbridge Securities, Inc., 1451 W. Cypress Creek Road, Suite 204, Fort Lauderdale, Florida 33309, a person with knowledge of the facts of this case.

(h) Jennifer Romano, Newbridge Securities, Inc., 1451 W. Cypress Creek Road, Suite 204, Fort Lauderdale, Florida 33309, a person with knowledge of the facts of this case.

(i) William Herlihy, Newbridge Securities, Inc., 1451 W. Cypress Creek Road, Suite 204, Fort Lauderdale, Florida 33309, a person with knowledge of the facts of this case.

(j) Jeremy Ross, Esq., Bush, Ross, Gardner, Warren and Rudy, PC, 220 South Franklin Street, Tampa, Florida 33602, a person with knowledge of the facts of this case.

(k) Barbara Rowe, Bush, Ross, Gardner, Warren and Rudy, PC, 220 South Franklin Street, Tampa, Florida 33602, a person with knowledge of the facts of this case.

(l) Jan Hornik, Bush, Ross, Gardner, Warren and Rudy, PC, 220 South Franklin Street, Tampa, Florida 33602, a person with knowledge of the facts of this case.

(m) Mauricio Madero O'Brien, c/o Jeremy Ross, Esq., Bush, Ross, Gardner, Warren and Rudy, PC, 220 South Franklin Street, Tampa, Florida 33602, a person with knowledge of the facts of this case.

(n) Raul Mendez, c/o Jeremy Ross, Esq., Bush, Ross, Gardner, Warren and Rudy, PC, 220 South Franklin Street, Tampa, Florida 33602, a person with knowledge of the facts of this case.

(o) Hartley Lord, c/o Jeremy Ross, Esq., Bush, Ross, Gardner, Warren and Rudy, PC, 220 South Franklin Street, Tampa, Florida 33602, a defendant in this case.

(p) Bryan Kos, c/o William Nortman, Esq., Akerman Senterfitt, 350 Las Olas Blvd., Suite 1600, Fort Lauderdale, Florida 33301-4217, a defendant in this case.

(q) Paul A. Spreadbury, 7975 La Nain Drive, Pensacola, Florida 32514, a defendant in this case.

(r) Andrew Kline, c/o Steven Gourley, Esq., Malek & Malek, 3625 Del Amo Boulevard, Suite 350, Torrance, California 90503, a defendant in this case.

(s) Thomas Heysek, a defendant in this case, 503 Pineo, Apt. 5, Mill Valley, California 94841 and/or P.O. Box 2515 San Francisco, California 94126.

(t) Julio Aspe, Esq., Riviera 62, Colonia Ampliacion Alpes, C.P. 01710 Mexico D.F., a person with knowledge of the facts of this case.

(u) Marco Antonio Alvarez Alonso, Esq., Riviera 62, Colonia Ampliacion Alpes, C.P. 01710 Mexico D.F., a person with knowledge of the facts of this case.

(v) Joe Fiore, Berkshire Capital Corp., 670 White Plains Road, Suite 120, Scarsdale, New York, a person with knowledge of the facts of this case.

(w) Mark Rice, IMA Advisors, c/o 2618 Fairway Drive, Sugarland, Texas, 77478, a person with knowledge of the facts of this case.

(x) Michael Spadaccini, Esq., 5703 Oberlin Drive, Suite 308, San Diego, California 92121, a person with knowledge of the facts of this case.

(y) Kirk Hughes, President, Interwest Stock Transfer, Inc., 1981 East Murray-Holliday Road, Suite 100, Salt Lake City, Utah 84117, a person with knowledge of the facts of this case.

(z) Bill Senner, Stalt Stock Transfer, Inc., 848 Tanager Street, Incline Village, Nevada 89451, a person with knowledge of the facts of this case.

(aa) Howell Woltz, a person with knowledge of the facts of this case, whose address is known to plaintiffs.

(bb) Vernice Woltz, a person with knowledge of the facts of this case, whose address is known to plaintiffs.

(cc) Fertina Turnquest, a person with knowledge of the facts of this case, whose address is unknown at this time and will be provided once ascertained.

(dd) Connie Oystermann-Webbe, a person with knowledge of the facts of this case, whose address is unknown at this time and will be provided once ascertained.

(ee) Sam Currin, Esq., Currin Law Firm, Currin Law Building, 20 Market Plaza, Raleigh, North Carolina 27601, a person with knowledge of the facts of this case.

(ff) Jeremy Jaynes, c/o Sam Currin, Currin Law Firm, Currin Law Building, 20 Market Plaza, Raleigh, North Carolina 27601, a person with knowledge of the facts of this case.

(gg) Randall Rohm, a person with knowledge of the facts of this case, whose address is known to the plaintiffs.

(hh) Timothy W. Ulrich, Esq., Vice-President and General Counsel, First Curacao International Bank, a person with knowledge of the facts of this case, First Curacao International Bank, P.O. Box 299 Kaya W.F.G. (JOMBI) Mensing, 18, Zeelandia, Curacao, Netherland Antilles.

(ii) Electronic Access Direct: 2055 Wood Street, Suite 102, Sarasota, Florida 34237.

This corporation and its employees have some knowledge of the facts of this case. Employees not previously named. Names and addresses will be provided once ascertained.

(jj) Sun State Securities, Inc., 2200 NW Corporate Blvd., Suite #100, Boca Raton,

Florida 33431. This corporation and its employees have some knowledge of this case. Employees not previously named. Names and addresses will be provided once ascertained.

(kk) Newbridge Securities, Inc., 1451 W. Cypress Creek Road, Suite 204, Fort

Lauderdale, Florida 33309. This corporation and its employees have some knowledge of this case. Employees not previously named. Names and addresses will be provided once ascertained.

(ll) IMA Advisors, c/o 2618 Fairway Drive, Sugarland, Texas 77478. This

corporation and its employees have some knowledge of this case. Employees not previously named. Names and addresses will be provided once ascertained.

(mm) Laughlin International, Inc., 2533 North Carson Street, Carson City, Nevada

89706. This corporation and its employees have some knowledge of the facts of this case. Employees not currently known. Names and addresses will be provided once ascertained.

(nn) All persons identified by all other parties in their respective Rule 26(a) disclosures.

(oo) All persons identified in the documents produced by Plaintiff and Defendants in their Rule 26 (a) disclosures.

(pp) All consulting and expert witnesses not yet identified for trial.

(qq) All impeachment and rebuttal witnesses to be ascertained.

Discovery is in progress and Oehmke reserves his right to supplement his witness list as more witnesses become known.

2. Pursuant to Fed. R. Civ. P. 26(a)(1)(B), Oehmke, hereby identifies the following documents that he may use to support his claims and defenses:

(a) All documents previously produced by Ventana Consultants, Ltd., to Plaintiff (bate labels VC001 through VC023).

(b) All documents submitted by the Plaintiff in support of its Ex Parte Motion For Order Freezing Assets.

(c) All documents listed by Plaintiff in its disclosures.

(d) All documents produced by any other party to this litigation.

(e) All impeachment and rebuttal documents to be ascertained.

Discovery is in progress and Oehmke reserves his right to produce supplemental documents.

3. Fed. R. Civ. P. 26(a)(1)(C) is not applicable to Oehmke at this time.

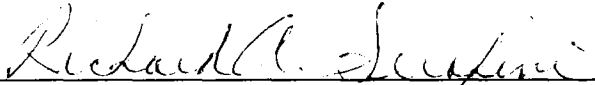
4. Fed. R. Civ. P. 26(a)(1)(D) is not applicable to Oehmke in the matter.

Respectfully submitted,

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- and -

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By: 
RICHARD A. SERAFINI
Florida Bar No. 0972037

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S.

Mail on this 20th day of April, 2005 on the following:

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