

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

U.S. COMMODITY FUTURES )  
TRADING COMMISSION and )  
OKLAHOMA DEPARTMENT OF )  
SECURITIES *ex rel.* IRVING L. )  
FAUGHT, )

Plaintiffs, )

v. )

Civil Action No. 09-CV-1284 (DLR)

PRESTIGE VENTURES CORP., a )  
Panamanian corporation, FEDERATED )  
MANAGEMENT GROUP, INC., a Texas )  
corporation, KENNETH WAYNE LEE, )  
an individual, and SIMON YANG (a/k/a )  
XIAO YANG a/k/a SIMON CHEN), an )  
individual, )

Defendants; and )

SHEILA M. LEE, an individual, DAVID )  
A. LEE, an individual, and DARREN )  
LEE, an individual, )

Relief Defendants. )

PLAINTIFFS' AMENDED FINAL WITNESS AND EXHIBIT LIST

PRESIDING JUDGE	PLAINTIFFS' ATTORNEYS	DEFENDANTS' ATTORNEYS
Judge David L. Russell	James H. Holl, III, CFTC Terra Bonnell, ODS Patricia A. Labarthe, ODS	<i>Pro Se</i>
TRIAL DATE (S)	COURT REPORTER	COURTROOM DEPUTY
November 2010		Nancy Stark

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF WITNESSES AND EXHIBITS EXPECTED TO BE CALLED OR USED
					Ms. Ling Ling Zhang, 1433 South Larkspur Court, Lafayette, Colorado, 80026, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Mark Li, 401 East Park Place, Oklahoma City, Oklahoma 73104, may be called to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Xihai Zhang, 8904 NW 114 <sup>th</sup> Street, Oklahoma City, Oklahoma 73162, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Ms. Susie Southwell, 9320 Broughton Court, Oklahoma City, Oklahoma 73132, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Hanjiang Zhu, 6233 Potrero Drive, Newark, California 94560, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.

					Ms. His-Ling Huang, 3075 Briaroak Drive, Duluth, Georgia 30096, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Ms. Ming Yu, 17005 Fenwick Boulevard, Oklahoma City, Oklahoma 73012, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Ms. Jian Yue, 3724 Stansbury Road, Norman, Oklahoma 73072, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Dr. Rong Ma, 3800 Gladney Lane, Keller, Texas 76244, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Jerry Wang a/k/a Guang-Ru Wang, 6208 Tilden Street, Fort Collins, Colorado 80528, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Ms. Mei Wu, 8847 17 <sup>th</sup> Avenue, 2 <sup>nd</sup> Floor, Brooklyn, New York, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.

					Ms. Chu Chu Wu, 159 Landing Road, Cordele, Georgia, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Ms. Chi-Ming Lee, 15654 North Peak Lane, Fontana, California, is expected to testify regarding her investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Ruyan Bryan, 9709 Horseshoe Road, Oklahoma City, Oklahoma 73162, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Hong Lu, 5901 Country Club Drive, Edmond, Oklahoma 73025, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Qing Yang, 2917 Montrose Drive, Bartlesville, Oklahoma, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Nong Rong Yu, 113 East Edwards, Apt. 9, Edmond, Oklahoma, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.

				<p>Chunfeng Liu, 1123 East Brooks Street, Norman, Oklahoma, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.</p>
				<p>Jiuhong Tang, 1123 East Brooks Street, Norman, Oklahoma, is expected to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.</p>
				<p>Mr. Stephen Moriarty and/or another person from his office, 100 North Broadway Avenue, Suite 1700, Oklahoma City, Oklahoma 73102, is expected to testify regarding information gathered pursuant to his duties as the Court-appointed receiver in this action which includes, but is not limited to: his communications with Defendants and Relief Defendants, the deposits into and disbursements from one or more bank accounts controlled by Defendants or Relief Defendants, and the assets of Defendants and Relief Defendants.</p>
				<p>Mr. Glen Grossman or another investigator for the Oklahoma Department of Securities, c/o Terra Bonnell, Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, is expected to testify regarding deposits into and disbursements from one or more bank accounts owned by Defendants or Relief Defendants.</p>
				<p>Ms. Michelle Bougas or another investigator for the CFTC, c/o James H. Holl, III, U.S. Commodity Futures Trading Commission, 1155 21<sup>st</sup> Street NW, Washington, DC 2005, is expected to testify as to Defendants' and Relief Defendants' financial information and trading activities.</p>

				<p>Mr. Nathan Johnson, c/o Terra Bonnell, Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, is expected to testify regarding the websites federatedmanagement.com and prestigeventures.com and may be called to testify regarding information contained on computers produced by Defendants.</p>
				<p>Mr. Kenneth G. Maillard or another representative of the Oklahoma Department of Securities, c/o Terra Bonnell, Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, is expected to testify regarding the lack of registration of the securities issued and sold by Defendants under the Oklahoma Uniform Securities Act of 2004 and the Oklahoma Securities Act.</p>
				<p>Ms. Carol Gruis or another representative of the Oklahoma Department of Securities, c/o Terra Bonnell, Oklahoma Department of Securities, 120 North Robinson, Suite 860, Oklahoma City, Oklahoma 73102, is expected to testify regarding the lack of registration of Defendants under the Oklahoma Uniform Securities Act of 2004 and the Oklahoma Securities Act.</p>
				<p>Ms. Sharon Pendleton or another representative of the National Futures Association, National Futures Association, 300 South Riverside Plaza, Suite 1800, Chicago, Illinois 60606, may be called to testify regarding the communications between the National Futures Association and one or more of the Defendants and the documents provided by one or more of the Defendants to the National Futures Association; this witness may also testify regarding the nature of defendants' registration status, or lack thereof.</p>

				Mr. Jeff Levine or another representative of Mesirow Financial, Inc., 353 North Clark, Chicago, Illinois 60654, is expected to testify regarding any accounts, or lack thereof, in the name of Prestige Ventures Corp., Federated Management Group, Kenneth Lee, Darren Lee, David Lee, Sheila Lee, and/or Simon Yang, at Pan America Capital Group Inc.
				Mr. Kenneth Lee, 1660 Jorrington Street, Mt. Pleasant, South Carolina 29466, has been deposed.
				Mr. Simon Yang, 1912 NW 176 <sup>th</sup> Terrace, Edmond, Oklahoma 73012, has been deposed.
				Mr. Darren Lee, 2676 Palmetto Hall Boulevard, Mt. Pleasant, South Carolina 29466, has been deposed.
				Mr. David Lee, 2676 Palmetto Hall Boulevard, Mt. Pleasant, South Carolina 29466, has been deposed.
				Ms. Sheila Lee, 1660 Jorrington Street, Mt. Pleasant, South Carolina 29466, has been deposed.
				All records, and any analysis thereof, pertaining to all accounts in the name of, for the benefit of, or under the control of Defendants and/or Relief Defendants, at any financial institution including, but not limited to, banks and Futures Commission Merchants ("FCM")
				All documents produced by investors of Federated Management Group or Prestige Ventures Corporation to the Receiver and/or Plaintiffs including, but not limited to, emails, marketing materials, applications and instructions received from the Defendants
				All documents produced by Defendants and/or Relief Defendants to the Receiver and/or Plaintiffs pursuant to the SRO/PI and relevant discovery requests

					All documents and data obtained from the computers produced by Kenneth Lee, Sheila Lee and/or Simon Yang to the Receiver and/or Plaintiffs
					All account statements issued or purportedly issued by Prestige Ventures Corporation, Federated Management Group, Kenneth Lee and/or Simon Yang
					All written correspondence between the National Futures Association, U.S. Commodity Futures Trading Commission, or representatives thereof, and Prestige Ventures Corporation, Federated Management Group, Kenneth Lee and/or Simon Yang
					All documents provided by Prestige Ventures Corporation, Federated Management Group, Kenneth Lee and/or Simon Yang to the National Futures Association or U.S. Commodity Futures Trading Commission
					Registration information obtained from the National Futures Association and U.S. Commodity Futures Trading Commission
					All corporate registration records for Federated Management Group, Inc. and/or Prestige Ventures Corporation
					Website prestigeventures.com and documents printed therefrom
					Website federatedmanagement.com and documents printed therefrom
					All communications between or among the Receiver and Defendants and/or Defendants' customers
					All communications between or among Plaintiffs, Defendants, and Relief Defendants

					All pleadings and other documents filed in this matter with the Court Clerk
					All document requests from the CFTC to financial institutions, and responses from the same, regarding records relating to trading accounts in the name of or controlled by Defendants and Relief Defendants
					All discovery responses provided by the Defendants and Relief Defendants in this action, including all documents and data relating to the same

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF WITNESSES AND EXHIBITS THAT MAY BE CALLED OR USED
					Mr. Zhong Xiang Luo, 17005 Fenwick Boulevard, Oklahoma City, Oklahoma 73012, may be called to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Mr. Edward Lou, 13310 Via Bellarado, Unit 2, San Diego, California 92129, may be called to testify regarding his investment in Federated Management Group or Prestige Ventures Corporation and the representations that were made by Defendants in connection therewith.
					Custodians of records for the financial institutions, FCMs, and other similar entities utilized by Defendants and/or Relief Defendants.
					Any and all persons who invested through Federated Management Group and Prestige Ventures Corporation, who are not otherwise identified on this list, may be called to testify regarding his/her investment and the representations that were made by Defendants in connection therewith.
					Any witness needed to rebut the testimony of a witness or exhibit identified on any witness or exhibit list submitted by a Defendant or Relief Defendant or offered at trial.
					All witnesses identified on any witness list submitted by a Defendant or Relief Defendant or called at trial.
					Transcript(s) of, and exhibits to, the deposition of Simon Yang
					Transcript(s) of, and exhibits to, the deposition of Kenneth Lee

					Transcript(s) of, and exhibits to, the deposition of David Lee
					Transcript(s) of, and exhibits to, the deposition of Darren Lee
					Transcript(s) of, and exhibits to, the deposition of Sheila Lee
					Transcript(s) of, and exhibits to, the deposition of Bi Lin Chen
					The deposition transcript and exhibits of any witness who has not yet been deposed
					Declarations of Kara Mucha, Nathan D. Johnson, Stephen J. Moriarty, Glen R. Grossman, Kenneth G. Maillard, Carol Gruis, Xihai Zhang, Dexiang "Edward" Luo, Jian Yue, Susie Southwell, Ming Yu, and Zhong Luo, and non-privileged supporting documentation
					All communications between Plaintiffs and Defendants' customers for which Plaintiffs do not assert a privilege
					Return receipts for documents mailed by certified mail
					All court records, relating to Prestige Ventures Corporation, Federated Management Group and/or Kenneth Lee from the Court Clerk of the District Court of Denton County, Texas
					All documents relating to Prestige Ventures Corporation, Federated Management Group and/or Kenneth Lee from the National Archives and Records Administration
					All records from the Federal Bureau of Prisons relating to Kenneth Lee

					Federal and State tax returns for the years 2002 through 2009 for Defendants and Relief Defendants
					All exhibits listed or offered by Defendants and/or Relief Defendants to which Plaintiffs assert no objection
					Demonstrative aids/evidentiary summaries of voluminous materials that have not yet been created

Dated: August 19, 2010

Respectfully Submitted,

/s/ James H. Holl, III

James H. Holl, III

U.S. Commodity Futures Trading Commission

1155 21st Street NW

Washington, DC 20581

Email: [kdriscoll@cftc.gov](mailto:kdriscoll@cftc.gov)

Telephone: (202) 418-5000

Facsimile: (202) 418-5538

ATTORNEYS FOR THE PLAINTIFF  
U.S. COMMODITY FUTURES TRADING  
COMMISSION

/s/ Terra Shamas Bonnell

Terra Shamas Bonnell, OBA # 20838

Patricia A. Labarthe, OBA # 10391

Oklahoma Department of Securities

120 North Robinson Avenue, Suite 860

Oklahoma City, Oklahoma 73102

Email: [tbonnell@securities.ok.gov](mailto:tbonnell@securities.ok.gov);

[plabarthe@securities.ok.gov](mailto:plabarthe@securities.ok.gov)

Telephone: (405) 280-7700

Facsimile: (405) 280-7742

ATTORNEYS FOR THE PLAINTIFF  
OKLAHOMA DEPARTMENT OF SECURITIES

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2010, I caused *Plaintiffs' Amended Final Witness and Exhibit List* to be served by U.S. mail and on the following:

Kenneth Lee  
1660 Jorrington Street  
Mt. Pleasant, SC 29466

Sheila Lee  
1660 Jorrington Street  
Mt. Pleasant, SC 29466

David Lee  
2676 Palmetto Hall Blvd  
Mt. Pleasant, SC 29466

Darren Lee  
2676 Palmetto Hall Blvd  
Mt. Pleasant, SC 29466

I also hereby certify that on August 19, 2010, I caused *Plaintiffs' Amended Final Witness and Exhibit List* to be served by email, by consent, on the following:

Simon Yang  
simonyang@cox.net

I also hereby certify that on August 19, 2010, I electronically transmitted *Plaintiffs' Amended Final Witness and Exhibit List* to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

James H. Holl, III

Katherine S. Driscoll

Stephen J. Moriarty

Warren F. Bickford, IV

/s/ Terra Shamas Bonnell