

STATE OF UTAH
OFFICE OF THE ATTORNEY GENERAL



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April 23, 2013

Transmitted via First class mail

Jeremy C Reutzel
Bennett, Tueller, Johnson & Deere
3165 East Millrock Drive Ste 500
Salt Lake City UT 84121

Re: In the matter of Jeffrey Kahn SD-13-0014.
Utah Division of Securities

Dear Mr. Reutzel

In accordance with Rule R151-4-503 of the Utah Administrative Code and the scheduling order in this matter, I am providing you with the Division's initial disclosures.

The individuals known to the Division who are likely to have discoverable information supporting the Division's claims or defenses are as follows:

Jeffrey Kahn

Richard Budge
286 North Blue Spruce
Layton, Utah 84041

Roshelle Lucky
13744 Vestry Road

Draper, Utah 84820

Sheila Thomas
Division of Securities
160 East 300 South 2nd Floor
P.O. Box 146760
Salt Lake City, 84114-6760

Mr. Aaron K. Azari
Vice Chairman and Trust Officer
Colorado State Bank and Trust
1600 Broadway
Denver CO 80202

Other witnesses as may become known to the Division through discovery or other avenues.

I am also providing you copies of the relevant and non-privileged contents of the Division's investigative file. Please note that I am not providing you with the Division's investigative summary because it is a protected record under the Government Records Access and Management Act ("GRAMA") and is privileged from discovery. See, for example, Utah Code Ann. §§ 63G-2-305 (9), (16), and (17).

In addition, many of the documents that have been provided to you have been redacted of information that is non-public and may not be released. The bases for such redactions include but are not limited to:

Records containing private information as defined in Utah Code Ann. § 63G-2-302(2)(b) and (d).

If you have any questions or would like to discuss this case, I can be reached at (801) 366-0310 or wfarraway@utah.gov.

Sincerely,



Wade Farraway
Assistant Attorney General

encl.