



**(a)(i) Individuals with Information**

Pursuant to Utah Admin. R. 151-4-503(a)(i) and (ii), the following individuals, together with their address and telephone number, are likely to have discoverable information supporting Respondents' claims and defenses.

1. Trent Williams ("Williams") may be contacted through his counsel, Bennett Tueller Johnson & Deere, 3165 East Millrock Drive, Suite 500, Salt Lake City, UT 84121, telephone (801) 438-2000. Williams has information regarding all aspects of this case.

2. Daniel Bryce Prescott ("Prescott") may be contacted through his counsel, Bennett Tueller Johnson & Deere, 3165 East Millrock Drive, Suite 500, Salt Lake City, Utah 84121, telephone (801) 438-2000. Prescott has information regarding all aspects of this case.

3. Brent Rose. Mr. Rose was a Landmark Financial Services, LLC ("Landmark") representative who was involved with Burke Tervort's purchase of real property and has information regarding that transaction. Mr. Rose's last known address was 338 Cherry Crest Drive, Draper, Utah 84020.

4. Sylvaine Pilault. Ms. Pilault and was previously married to Ed Mercer, was the President of EDSYL, and has information and knowledge regarding EDSYL's loan to Landmark. Ms. Pilault's last known address was Playa Tortuga #10, Cortes, Puntarenas, Costa Rica.

5. Ed Mercer. Mr. Mercer and was previously married to Sylvaine Pilault, was involved with EDSYL, and has information and knowledge regarding EDSYL's loan to Landmark. Mr. Mercer's last known address was Playa Tortuga #10, Cortes, Puntarenas, Costa Rica.

6. Burke Tervort. Mr. Tervort has information and knowledge regarding his purchase of property from Landmark. His last known address was 290 North 500 East, Salem, Utah 84653.

7. Mike Rosa. Mr. Rosa was an affiliate of Landmark and has information and knowledge regarding the policies and procedures specific to the purchase of property from Landmark. His last known address was 199 West 3700 North, Provo, Utah 84604.

8. Ren Bell. Mr. Bell purchased several properties from Landmark and has information and knowledge regarding the procedures involved with his purchase of property from Landmark. His last known address was 1273 West 2800 South, Syracuse, Utah 84075.

9. Thomas Reeves. Mr. Reeves has information and knowledge regarding the management of properties that Mr. Tervort purchased from Landmark. His last known address was 4350 St. Andrews Rd. Suite G, Columbia, SC 29210.

10. Respondents herein incorporate by reference those individuals disclosed by The Division of Securities of the Utah Department of Commerce.

11. Respondents reserve the right to supplement these disclosures as discovery and investigation reveal additional individuals who may have information pertinent to this action.

**(b)(i) Discoverable Documents, Data Compilations, and Tangible Things**

Pursuant to Utah Admin. R. 151-4-503(b), the following documents, data compilations, and tangible things, are either produced herewith or described by category and location together with a description of when and how those documents and things may be accessed.

Documents relating to EDSYL's loan to Landmark, including relevant agreements and correspondence, and documents relating to Mr. Tervort's purchase of real property from Landmark, including relevant agreements and correspondence, will be made available for inspection at the office of Bennett Tueller Johnson & Deere, 3165 East Millrock Drive, Suite 500, Salt Lake City, UT 84121. Appointments to make such inspections may be made with Respondents' counsel and shall be made at least five business days prior to any proposed inspection.

DATED this 23<sup>rd</sup> day of August, 2013.

BENNETT TUELLER JOHNSON & DEERE

  
Shane L. Keppner  
*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of August, 2013, I caused to be hand-delivered, a signed original and a true and correct copy, respectively, of the foregoing **RESPONDENTS' RULE 151-4-503 INITIAL DISCLOSURES** upon the following:

**Original:**

Administrative Court Clerk  
c/o Julie Price  
Utah Division of Securities  
160 E. 300 S., 2<sup>nd</sup> Floor  
Box 146760  
Salt Lake City, UT 84114-6760

**Copy:**

D. Scott Davis  
Assistant Attorney General  
Utah Division of Securities  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, UT 84114-0872

