

The responses set forth below are provided without prejudice to Deponent's right to object to the admission into evidence of any information produced pursuant to this First Set of Interrogatories .

2.

Deponent reserves the right to object to further discovery concerning this First Set of Interrogatories now responded to upon any valid ground.

3.

Deponent reserves the right to amend and/or supplement the responses set forth herein at any time up to and including the time of trial.

4.

Deponent objects to this First Set of Interrogatories to the extent that it seeks information neither relevant to this action, nor reasonably calculated to lead to the discovery of admissible evidence.

5.

Deponent objects to this First Set of Interrogatories to the extent it attempts to impose obligations on Deponent other than those imposed or authorized by the Federal Rules of Civil Procedure.

6.

Deponent objects to this First Set of Interrogatories to the extent it seeks the disclosure of information protected from discovery by the attorney-client privilege, the attorney work product doctrine or any other applicable privileges or exemptions.

7.

Deponent objects to this First Set of Interrogatories to the extent that it is overbroad as to subject matter and/or time.

8.

Deponent objects to this First Set of Interrogatories to the extent that it is vague, ambiguous or lacking in precision sufficient to permit a response.

9.

Deponent objects to this First Set of Interrogatories to the extent that it is unduly burdensome.

10.

These responses are based on the information available at the present time. Deponent is currently continuing to review and search for information.

11.

Deponent objects to this request to the extent that information is currently already in the custody and control or possession of Thomas Richey, Esq., the court-appointed Receiver in this matter, and therefore, this request is meant to do no more than harass and burden Deponent.

12.

These General Objections and Statements shall be deemed continuing as to each interrogatory response, incorporated in response to each request for information whether or not specifically stated in response to each interrogatory , and are not waived or in any way limited by the following responses.

13.

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

1.

Please list all investment programs offered, or entities through which investment programs were offered, to anyone by you (including any offerings made by you at the request, suggestion, or direction of Zahra Ghods or any other person), any of the Receivership Companies, any entity controlled by you, or anyone acting at your direction or the direction of any of the Receivership Companies. Include in your response, but do not limit your response to, those investment programs and entities listed in Appendix A, attached hereto.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

2.

For all entities/investment programs listed in No. 1, please explain the circumstances that led to each entity's/investment program's involvement with you or any of the Receivership Companies, including, but not limited, (a) how you or any of the Receivership Companies were first introduced to the entity/investment program; (b) what steps were taken by you, any of the Receivership Companies, or anyone acting at your direction or the direction of any of the Receivership Companies to verify the legitimacy of the entity/investment program; and (c) what promises or representations were made by

the entity/investment program to you, any of the Receivership Companies, or anyone acting at your direction or the direction of any of the Receivership Companies.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

3.

For all entities/investment programs listed in No. 1, please explain in what type of business each entity/investment program was involved.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

4.

For all entities/investment programs listed in No. 1, please explain how each investment operated, including, but not limited to, where money was sent after it was paid to the entity/investment program, how interest or other gains were generated or calculated, and how and when any gains or principal were returned to investors.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

5.

For all entities/investment programs listed in No. 1, please explain who is associated with the entity/investment program, including, but not limited to, officers, directors, employees, shareholders, and investors.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

6.

For all entities/investment programs listed in No. 1, please state where you sent investor funds and list any bank or brokerage accounts holding funds belonging to those entities/investment programs. Include the name of the bank or brokerage firm, account number, and current balance for each account.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

7.

For all entities/investment programs listed in No. 1, please explain your role in, or relationship to, each entity/investment program, if any.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

8.

For all entities/investment programs listed in No. 1, please explain what role, if any, IRA Resources, Inc.; Pensco, Inc.; Pensco Pension Services, Inc.; Pensco Trust Co.; Entrust Administration, Inc.; or Entrust MID South, LLC had in the entities'/investment programs' efforts to obtain investments, including, but not limited to, any action on the part of IRA Resources, Inc.; Pensco, Inc.; Pensco Pension Services, Inc.; Pensco Trust Co.; Entrust Administration, Inc.; or Entrust MID South, LLC to recruit investors, make recommendations on investments, approve investments, or transfer customer IRA investments to the entities/investment programs or transfer customer funds to the entities/investment programs.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

9.

Please list any payment received by you for any reason (including, but not limited to investments, commissions, loans, wages, or bill payments) from any of the entities/investment programs listed in No. 1.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

10.

For each of the Receivership Companies, please state who had authority over each entity's or investment program's bank accounts (including, but not limited to, who

opened the accounts, who is on the signature cards, and who may authorize wire transfers) prior to May 17, 2006.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

11.

Please list all persons that you advised, or that others advised at your direction, when doing business as Weston Rutledge & Company, Inc.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

12.

Please list all persons that are currently, or have been in the last three years, employed by you personally or through a business entity.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

13.

Please list all credit card accounts held by you personally or on behalf of a business entity. Include the name of the credit card company, account number, and current balance outstanding for each account.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

14.

Please list all entities for which you have created and/or are now an officer or director or for which you have been an officer or director in the last three years, your title, and the dates of service for each.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

15.

Please list any automobiles in your possession in which any of the Receivership Companies own any interest, for which any of the Receivership Companies hold title, or for which any of the Receivership Companies have made any payments, either directly or by way of reimbursement to you. Include in this list any automobiles that you or someone acting at your direction has transferred to the possession of another.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

16.

Please list all items purchased on behalf of any of the Receivership Companies at Home Depot for which payment is outstanding, including, but not limited to purchases that led to a currently outstanding bill for \$757.75. For each item, please explain what

was purchased and why any of the Receivership Companies should make payment for such items.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

17.

Has Todd Merolla, PC performed work for any of the Receivership Companies and if so, please describe the matters on which he has worked and the outcomes of such matters.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

18.

Please list the account balances for any accounts belonging to you, any of the Receivership Companies, or entities related to you or any of the Receivership Companies at Trust Administrative Services.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

19.

Is the storage space currently rented at Armuchee Self Storage, Storage One, Inc. used by any of the Receivership Companies and if so, please list the items currently stored in the storage space and state who has the key.

RESPONSE:

Defendant Geoffrey A. Gish reserves his right to refuse to answer the First Set of Interrogatories under the Fifth Amendment to the United States Constitution.

s/ Ernest L. Greer

Ernest L. Greer

Georgia Bar No. 309180

Attorney for Geoffrey Gish

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff)	
)	Civil Action File
v.)	
)	No. 1:06-CV-1171-CC
GEOFFREY A. GISH; WESTON)	
RUTLEDGE FINANCIAL SERVICES,)	
INC.; ZAMINDARI CAPITAL, LLC;)	
LEXINGTON INTERNATIONAL)	
FUND, LLC a/k/a LEXINGTON)	
INTERNATIONAL FUND, INC.; AND)	
OXFORD ADAMS CAPITAL, LLC,)	
)	
Defendants)	

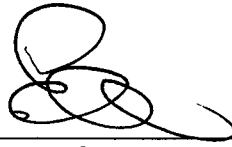
CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the foregoing pleading upon all parties by hand to the following counsel:

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Senior Trial Counsel
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Jennifer Odom, Esq.
Powell Goldstein, LLP
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This 13th day of November, 2006.



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