

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX COUNTY

AYER DISTRICT COURT
DOCKET NUMBER 0748CV0568

TROY CAPITAL, LLC, ASSIGNEE OF EASY)
LOAN CORPORATION, ASSIGNEE OF GE)
CAPITAL FINANCIAL INC.)
Plaintiff)

Vs)

FRANK P. KARKOTA, JR)
Defendant)

REQUEST FOR DOCUMENTS

Defendant requests, pursuant to Massachusetts Civil Procedure Rule 34, that the Massachusetts Board of Bar Overseers (BBO) produce the following documents by delivering them to the office of the Defendant within 30 days from the date of service of this Request.

The following document requests pertain to investigations B2-06-0222 and B2-06-(9)222 of attorney George Nader.

1. A list of all witnesses, including, but not limited to, individuals, corporations, and government entities that were contacted during this investigation.
2. Transcripts or notes from the interviews of these witnesses.
3. A list of all documents that were examined during this investigation.
4. Copies of all documents, except those known to be in the possession of the Defendant.
5. The document(s) that prove that the IRS refused the Defendant's payment and would have seized the business even if the taxes had been paid in full.
6. A record of all communications by the BBO with the Internal Revenue Service, including, but not limited to, written correspondence, telephone conversations, FAXes, and e-mails.

7. A record of all communications by the BBO with the New Hampshire Department of Revenue, including, but not limited to, written correspondence, telephone conversations, FAXes, and e-mails.
8. A record of all communications by the BBO with the GE Capital Corporation, including, but not limited to, written correspondence, telephone conversations, FAXes, and e-mails.
9. Since there was a financial discrepancy in the bankruptcy, an audit was mandatory in a competent investigation. The Defendant requests a copy of the audit.
10. A list of complaints filed by other individuals or entities against George Nader.
11. The criminal investigation performed by the United States Treasury Inspector General exonerated the IRS agent. The IG agent recommended an investigation of attorney Nader by the BBO. The Defendant requests documents to show that Bruce Eisenhut is qualified to conduct a criminal investigation.

Frank P. Karkota, Jr. Pro Se
17 Cowdry Hill Road
Westford, MA 01886

978 399-0091

DATE: November 24, 2007

CERTIFICATE OF SERVICE

I, Frank P. Karkota, Jr. pro se, hereby certify that I have, this November 24, 2007, mailed a copy of the above request for documents, postage prepaid, The Massachusetts Board of Bar Overseers, 99 High Street, Boston, MA 02110 and to the Plaintiff's attorney, Brian Aylward, 5 Essex Green Drive, Peabody, MA 01960

Frank P. Karkota, Jr. Pro Se