

IN THE CIRCUIT COURT OF THE  
17TH JUDICIAL CIRCUIT IN AND  
FOR BROWARD COUNTY, FLORIDA

COMERICA BANK,  
a Texas banking corporation,

CASE NO. 12-013597 (18)

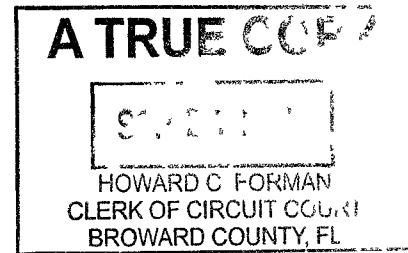
Plaintiff,

FLORIDA BAR NOS. 19968 & 28585

vs.

TROPIC RANCH, INC. a Florida  
corporation, H.K. HOTEL  
MANAGEMENT, LLC, a Michigan  
limited liability company, HANNA  
KARCHO-POLSELLI, individually,  
BROWARD COUNTY, FLORIDA, a  
political subdivision of the State of  
Florida, and KENNETH A. FRANK,  
individually,

Defendants.



**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS  
TO DEFENDANT H.K. HOTEL MANAGEMENT, LLC**

Pursuant to Florida Rule of Civil Procedure 1.370, Plaintiff Comerica Bank ("Plaintiff") requests Defendant H.K. Hotel Management, LLC to admit the following within thirty (30) days after service hereof:

1. Tropic Ranch, Inc. owns the real property located in Broward County, Florida described in paragraph 32 of the Complaint (the "Property").
2. You borrowed Three Million One Hundred Eighty-Five Thousand and No/Dollars (\$3,185,000.00) from Plaintiff on December 6, 2006 (the "H.K. Loan").
3. You executed the Variable Rate - Installment Note attached to the Complaint as Exhibit "A" (the "H.K. Note").

4. You executed the written guaranty attached to the Complaint as Exhibit "D" (the "Karcho-Polselli Guaranty").

5. You owe money to Plaintiff in connection with the H.K. Loan.

6. You owe money to Plaintiff in connection with the Karcho-Polselli Guaranty.

7. You do not have sufficient funds to repay the H.K. Loan.

8. You do not have sufficient funds to repay the Karcho-Polselli Guaranty.

9. On June 9, 2010, Plaintiff entered into a Forbearance Agreement with you, as amended on September 3, 2010 and again on May 5, 2011.

10. You owe Plaintiff \$21,690.84 as reimbursement for the 2009 and 2010 real property taxes that were due on the Property.

11. You owe Plaintiff \$42,177.25 for 2011 real property taxes that were due on the Property.

12. You failed to pay the personal property taxes due for 2010 in the amount of \$385.04 that were due on the Property.

13. You failed to pay the personal property taxes due for 2011 in the amount of \$391.60 that were due on the Property.

14. You have not maintained the property insurance coverage for the Property.

15. All units that comprise the Property are not available for guest use.

16. The Property is not operational.

17. The Property is not generating any income.

18. Plaintiff has not interfered with your ability to obtain a permit to make any necessary repairs to the Property.

Dated: September 20, 2012

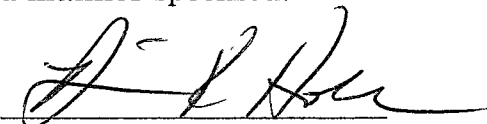
Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20th day of September 2012, a copy of the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Service List below in the authorized manner specified.

By:   
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