

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)

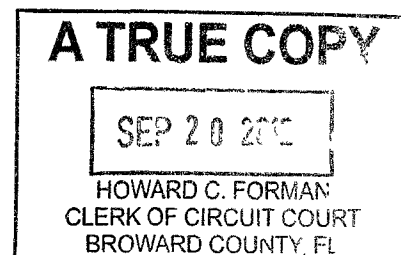
Plaintiff,

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 TROPIC RANCH, INC.**

Pursuant to Florida Rule of Civil Procedure 1.370, Plaintiff Comerica Bank ("Plaintiff") requests Defendant Tropic Ranch, Inc. to admit the following within thirty (30) days after service hereof:

1. You own real property located in Broward County, Florida described in paragraph 32 of the Complaint (the "Property").
2. You executed the written guaranty attached to the Complaint as Exhibit "E," referred to herein as the "Tropic Ranch Guaranty."
3. You executed the written Continuing Collateral Mortgage attached to the Complaint as Exhibit "F," referred to herein as the "Mortgage."

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

5. You owe money to Plaintiff in connection with the Tropic Ranch Guaranty.

6. You owe money to Plaintiff in connection with the Mortgage.

7. You do not have sufficient funds to repay the Tropic Ranch Guaranty in full.

8. You do not have sufficient funds to repay the Mortgage in full.

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

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

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

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

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

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

15. The Property is not operational.

16. The Property is not generating any income.

17. 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.

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