

25. The remaining allegations of the First Cause of Action are also incorporated hereinbelow by reference thereto.

WHEREFORE, plaintiff prays for the following relief against SIS and all defendants as to both Causes of Action:

A. An accounting of all trust funds in defendants' possession or under their control and which belong to plaintiff.

B. Judgment against defendants, jointly and severally, for all trust funds in defendants' possession or under their control which belong to plaintiff, together with punitive damages for the wrongful conversion and detention thereof by defendants in an amount to be fixed by the Court.

C. An accounting of all premium income generated by insurance business written by SIS for plaintiff since November 30, 1984.

D. Judgment against SIS for all sums owed by it to plaintiff for uncollected premiums due plaintiff on insurance written for plaintiff by SIS since November 30, 1984.

E. That the real property hereinabove described and belonging to SIS be attached and held as security for whatever judgment plaintiff may recover against defendants.