

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 03-C-3904
	)	
v.	)	Hon. Robert W. Gettleman
	)	
KEVIN TRUDEAU,	)	
	)	
Defendant.	)	
	)	

**FTC’S MOTION FOR LEAVE TO FILE A STATEMENT CONCERNING  
DEFENDANT’S LETTERS OF DIRECTION**

In light of the importance of this litigation and Defendant Kevin Trudeau’s proposal on Friday afternoon to send “Letters of Direction” to various persons and institutions concerning his assets, Plaintiff Federal Trade Commission respectfully requests leave to file a statement addressing this proposal prior to the imposition of Court-ordered coercive sanctions tomorrow. The proposed statement is attached hereto.

The FTC has noticed this motion for the already-scheduled status conference Tuesday morning, when the FTC anticipates Trudeau will argue that these letters purge his contempt or, alternatively, that the Court should yet again defer sanctions for an indefinite time until he receives responses to these letters. The proposed filing addresses these new arguments, which the FTC respectfully urges the Court to reject.

Dated: October 21, 2013

David O’Toole (dotoole@ftc.gov)  
Federal Trade Commission  
55 West Monroe Street, Suite 1825  
Chicago, Illinois 60603-5001  
Phone: (312) 960-5601  
Fax: (312) 960-5600

Respectfully Submitted,

/s/ Jonathan Cohen  
Michael Mora (mmora@ftc.gov)  
Jonathan Cohen (jcohen2@ftc.gov)  
Amanda B. Kostner (akostner@ftc.gov)  
Federal Trade Commission  
600 Pennsylvania Ave., N.W. M-8102B  
Washington, DC 20580  
Phone: 202-326-3373; -2551; -2880

**CERTIFICATE OF SERVICE**

I, Jonathan Cohen, hereby certify that on October 21, 2013, I caused to be served true copies of the foregoing by electronic means, by filing such documents through the Court's Electronic Case Filing System, which will send notification of such filing to:

Kimball Richard Anderson  
kanderson@winston.com

Thomas Lee Kirsch, II  
tkirsch@winston.com

Katherine E. Rohlf  
kcroswell@winston.com

Blair R. Zanzig  
bzanzig@hwzlaw.com

/s/ Jonathan Cohen  
Jonathan Cohen (jcohen2@ftc.gov)  
Attorney for Plaintiff  
Federal Trade Commission

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 03-C-3904
	)	
v.	)	Hon. Robert W. Gettleman
	)	
KEVIN TRUDEAU,	)	
	)	
Defendant.	)	
	)	
	)	

**FTC’S STATEMENT CONCERNING DEFENDANT’S LETTERS OF DIRECTION**

**I. Introduction**

Last month, the Court found that Trudeau “has not been fully cooperative or candid with the Receiver.” DE751 (Sept. 18, 2013). Last week, the Court found that “Trudeau has continued to falsely claim that he has and controls no assets that would be available to satisfy the remedial obligation imposed upon him by the Court’s June 2010 order,” and ordered him incarcerated “until he complies with any of the four conditions” the Court’s August 7, 2013 Receivership Order identified. DE772 (Oct. 16, 2013) at 2. Although the Court deferred coercive sanctions until October 22 to “allow Trudeau to attend a legal defense fundraising meeting in Washington, D.C. on October 21, 2013,”<sup>1</sup> *id.* at 2, the Court ordered that, after Trudeau completes this fundraising, he must report to the United States Marshal “immediately” following the next day’s hearing, *see id.* at 2-3.

On Friday, the FTC listened to a teleconference with Trudeau, his attorneys, and the Receiver’s representatives.<sup>2</sup> Based on that call, the FTC understands that Trudeau will send additional “Letters of Direction” to various persons and institutions asking them to confirm that

---

<sup>1</sup> During Friday’s teleconference, Trudeau stated that he will attend a fundraising dinner on October 20 and another fundraising event on October 21. PXA at ¶ 19.

<sup>2</sup> The FTC was permitted to listen, but was asked not to participate.

he has no assets,<sup>3</sup> and that he will argue tomorrow that these letters purge his contempt or, alternatively, that the Court should yet again defer sanctions for an indefinite time until he receives responses to these letters. The FTC respectfully urges the Court to reject these new arguments and continue with the course its prior orders established.

## II. Discussion

For several reasons, the Court should proceed with coercive sanctions in accordance with its orders: (1) the letters do not change the Court's prior findings or purge Trudeau's contempt; (2) consumers should not have to wait for responses from third parties when the primary issue is what Trudeau knows; (3) because Trudeau is not yet incarcerated, the letters may be ineffective or counterproductive; (4) the letters are unlikely to explain various transfers, commissions, royalties, or otherwise prove that Trudeau has purged; and (5) responses will not make Trudeau's incredible claims about gold bars, coins, and cufflinks any more plausible.<sup>4</sup>

---

<sup>3</sup>Trudeau also made two additional offers. First, Trudeau proposed to "send a letter [of direction] to every bank in the world," to confirm that he does not have any unknown accounts. PXA at ¶ 17. Feasibility aside, offshore accounts are almost certainly held in the name of nominees (like Trudeau's wife). For instance, the Global Bank of Commerce in Antigua already confirmed that Trudeau does not have an account, but Nataliya Babenko does—where she received a transfer from GIN FDN after the Court's asset freeze and Receivership Order. *See* PXA:15 (transfer from National Westminster Bank); Receiver's Supp. Report (DE750-1) (Sept. 16, 2013) at 2. Second, Trudeau offered to sit down with the Receiver at the 130 Quail Ridge Drive offices and "spend hours" reviewing financial records that might help "jog [his] memory." PXA at ¶ 18. The Receiver already has indicated that Trudeau's purported forensic accounting assistance is unnecessary (as opposed to his straightforward disclosure of assets), *see* DE764 (Oct. 4, 2013) at 2, and Trudeau's newfound financial knowledge stands in marked contrast to his prior emphatic position that associates like Neil Sant and Michael Dow handled everything for him. In fact, on Friday's call, Trudeau compared himself to Oprah Winfrey (a television personality with significant financial interests), and stated that, like her, "I don't know anything about the money coming in and going out." PXA at ¶ 18.

<sup>4</sup>The FTC also wishes to correct an error FTC counsel made Wednesday. Specifically, counsel stated that the Trudeau had not disclosed statements for Global Information Network FDN ("GIN FDN") accounts in Liechtenstein and the U.K. Although the FTC has not received such statements, the Receiver clarified to the FTC that Trudeau associate Lee Kenny disclosed the U.K. statements to the Receiver, and the Receiver located Liechtenstein statements in Sant's office. The issue is not the absence of statements, but where the money from these accounts went. As the Receiver identified in his Supplemental Report (and as the FTC's prior filing discussed), between January 1, 2013 and September 6, 2013, more than \$15 million flowed into GIN FDN accounts, and more than \$16 million flowed out. *See* PXA:1, DE750-1 (Sept. 16, 2013). Unexplained payments from GIN FDN during this period include, among others, **\$1,360,636.66** to Global Sales Solutions (which is an entity in the Receivership, *see* DE742 (Aug. 7, 2013) at 4), **\$644,727.70** to Office Pool GmbH, and \$129,692.34 to W.P. Barlow, whom Trudeau engaged to lobby the FTC to drop this case. *See* PXA:1 at 2, DE750-1 (Sept. 16, 2013);

**A. The Letters Do Not Alter Any of the Court’s Prior Findings or Purge Trudeau’s Contempt.**

Trudeau must be released when the Court is satisfied that he has met one of the four purge conditions—but the Court should not release him earlier, or withdraw its prior order requiring coercive incarceration. Undoubtedly, Trudeau will continue facially cooperative actions that do not actually disclose what he knows about his assets—which is why the Court ordered coercive incarceration in the first place. The fact that Trudeau sends these letters does not reveal (and will not reveal) what Trudeau knows about his assets, nor does it make Trudeau any more honest, nor does it alter the Court’s conclusion that he “continue[s] to falsely claim that he has and controls no assets” that he can use to redress consumers. *See* DE772 (Oct. 16, 2013) at 2. Accordingly, these letters do not purge Trudeau’s contempt, and are not a reason to defer the sanction yet again.

**B. Consumers Should Not Have To Wait for Responses to the Letters When the Issue Is What Trudeau Knows.**

Consumers already have waited years for redress, and they should not have to wait any longer. First, the easiest and quickest way for Trudeau to purge his contempt is for him to be fully forthcoming with respect to every aspect of his financial affairs ranging from royalties to the Kiev apartment. This could occur immediately. Instead, Trudeau has elected to proceed with a time-consuming alternative that will not disclose the most important information—namely, what **Trudeau** knows about his assets. Even if these letters could purge his contempt (and they cannot), Trudeau’s decision to attempt to purge by urging third parties to vouch for his stories is not a basis to defer sanctions further.

Second, there is no way to know when responses to Trudeau’s new round of letters will arrive, if ever. Nor is there any way to know what the responses will say (although they will not reveal what Trudeau knows about his assets). In fact, if Trudeau’s wife and associates believe the Court will wait to incarcerate him until they respond, their responses to Trudeau’s inquiries

---

*see also* PXA:2 (emails regarding lobbying efforts).

will not arrive with any dispatch. Because the letters will take time without forcing Trudeau to reveal what he knows, they are not a reason to defer sanctions yet again.

**C. Letters of Direction Are Often Ineffective and May Be Counterproductive.**

Although sending numerous “letters of direction” helps Trudeau appear cooperative, it is unlikely they will produce results and they may actually make matters worse (especially if the communications are sent before Trudeau is incarcerated). First, Trudeau argued at some length that he has already sent more than a dozen letters of direction and emails to third parties requesting information, *see* Trudeau Br. (DE766) (Oct. 11, 2013) at 13-14, but key Trudeau associates (including his wife and his offshore asset protection planner, Michel van Roon) have not responded with any material information. Second, even if these individuals ultimately respond to Trudeau’s letters to secure his release, they are very unlikely to disclose any information while Trudeau is not incarcerated. Worse, reminding them that Trudeau faces continued legal pressure to disclose assets he controls may motivate Babenko, van Roon, and others to take additional “asset protection” measures designed to make his wealth even more difficult to locate.

**D. Letters of Direction Cannot Resolve Unanswered Questions Concerning Transfers, Royalties, and Commissions, or Otherwise Purge the Contempt.**

Responses to the letters are unlikely to address significant evidence that Trudeau has not been forthcoming regarding his assets because—at best—the responses will present a materially incomplete picture concerning where assets (including royalties, commissions, and transfers) have gone. For instance, more than a month ago, Trudeau asked the Global Bank of Commerce in Antigua to state whether he had an account there, and the bank confirmed that he did not. *See* PXA:3. The issue, however, is that Babenko does have an account there, and GIN FDN (a receivership entity) wired money to her Antigua account in August, twelve days after the Court’s Receivership Order (and almost a month after the Court froze GIN FDN’s assets). *See* Receiver’s Supp. Report (Sept. 16, 2013) (DE750-1) at 2. If he wanted to, Trudeau himself

almost certainly could explain this transaction now (and return the funds),<sup>5</sup> but another letter to the bank will not force him to do this.

To provide another example, less than two weeks ago, Trudeau argued that “no evidence exists” that he received proceeds from infomercials, DE766 (Oct. 11, 2013) at 9, despite proof that \$4.3 million went to Trustar Productions,<sup>6</sup> and despite evidence in the Receiver’s Report that approximately \$2.2 million went from Trustar to Trudeau directly.<sup>7</sup> If he wants to, Trudeau can give honest answers now about where these assets went, which would help Trudeau purge, but letters of direction will not. Likewise, Trudeau claims that “he was not directly involved” in the acquisition of a \$700,000<sup>8</sup> Kiev apartment, *see* DE766 (Oct. 11, 2013), despite considerable evidence of his extremely direct involvement, *see, e.g.*, PXA:7 (“I am keen on just paying off the whole loan so natalie owns it outright with no mortgage as this is our ‘home’ in Ukraine”).<sup>9</sup> Trudeau has not been forthcoming regarding this \$700,000 apartment, and letters of direction will not reveal what Trudeau knows about the transaction.

To provide one final example, Trudeau apparently has a royalty agreement of some sort with Future Transactions Company, PXA:9, an entity owned by close associate Lee Kenny, PX:10. Kenny assumed some of Sant’s responsibilities after Sant resigned, including the

---

<sup>5</sup> Notably, notwithstanding the fact that the Receiver’s Supplemental Report discussed the Antigua account, *see* Receiver’s Supp. Report (Sept. 16, 2013) (DE750-1) at 2, and the FTC emphasized it as well, *see* DE759 (Sept. 30, 2013) at 9, Trudeau’s most recent filing is conspicuously vague concerning the Antigua account. Trudeau simply asserts that he does not control it, and that he has disclosed everything he knows about it already. *See* DE766 (Oct. 11, 2013) at 9-10. Given the Court’s finding that Trudeau controls GIN FDN, *see* DE729 (July 26, 2013) at 1; DE713 (July 15, 2013) at 14-16 (proposed findings of fact), and the powerful evidence supporting that finding, Trudeau’s denial is extremely implausible.

<sup>6</sup> *See* DE767-1 (Oct. 14, 2013) at 2. Trustar Productions is a receivership entity held by offshore KMT Fiduciary Trust, which the Court found that Trudeau controls. *Id.* at 2 n.1-2.

<sup>7</sup> *See* PXA:4, Receiver’s Report, Ex. 3, Consolidated Statements of Balance Sheet (Sept. 6, 2013) (DE747-2) (\$2,226,729.29 “due from” Trudeau to Trustar); PXA:5, Spreadsheet Provided by Receiver (detailing the \$2,226,729.29; notably, the many round numbers suggest that these were not payments for alleged business expenses).

<sup>8</sup> PXA:6 (email from Marc Lane to Neil Sant; “The appraised value as of April 23, 2010 was US **\$703,676.67**”) (emphasis added).

<sup>9</sup> *See also* PXA:8 at 1 (email from Lane to Trudeau; “**KT, Here’s a communication from our counsel in Kiev, specifying the sums due and payment instructions.**”) (emphasis added); DE767-1 (Oct. 14, 2013) at 7 n.14.

oversight of Trudeau's effort to lobby the FTC, *see* PXB, W.P. Barlow Dec., and Future Transactions made a payment to Marc Lane earlier this year, PXA:11 (wire from U.K. account).<sup>10</sup> Significantly, Trudeau sent a letter of direction to Kenny more than a month ago, asking Kenny to provide the Receiver with "detailed information and documentation regarding the Future Transaction Company[.]" PXA:12. To date, Kenny has not provided this information, and there is no reason that another letter will move matters forward. Instead, Trudeau himself must honestly disclose everything he knows regarding his relationship with Future Transactions.

**E. Responses to the Letters Will Not Make Trudeau's Claims About Physical Assets Any Less Implausible.**

Significantly, additional letters of direction will not resolve any of the issues associated with gold bars and coins Trudeau controls (or the cufflinks). The problem is that Trudeau has not provided candid and forthcoming answers regarding these assets, and letters of direction will not help explain the substantial evidence that Trudeau controls these assets. For instance, multiple filings<sup>11</sup> have discussed \$110,000 worth of gold coins purchased from Rosland Capital with a check a Natural Cures employee obtained from a check drawn from a bank branch in Ojai. *See* PXA:13 (invoice); PXA:14 (check).<sup>12</sup> Although the invoice shows the coins were shipped to Babenko at Trudeau's Ojai address, the invoice also reflects the following account number: "**KT930**." PXA13 (emphasis added). According to Rosland Capital's Compliance Officer, the account number's first two letters are the customer's initials, and the second three numbers are the customer's zip code (Ojai's zip code is 93023). *See* PXC. However, Trudeau contends "that Natalia Babenko purchased and received the gold coins in 2008." Tr. Br. (DE766) (Oct. 11,

---

<sup>10</sup> Kenny worked with Trudeau for approximately twenty years. Kenny is based in the United Kingdom and serves as GIN FDN's "Executive Director." *See* Receiver's Report (Sept. 6, 2013) (DE747-1), Ex. 1. Babenko signed Kenny's employment agreement on GIN FDN's behalf, and "[t]he Receiver does not find it credible that Ms. Babenko signed this document without the direction of Mr. Trudeau." *Id.* at 5.

<sup>11</sup> *See, e.g.*, FTC Statement, DE759 (Sept. 30, 2013) at 7.

<sup>12</sup> As prior filings explained, Patrick Lee worked for Natural Cures, which Trudeau's offshore KMT Fiduciary Trust ultimately controlled. *See* FTC Statement (Sept. 30, 2013) (DE759) at 7 n.13.



2013) at 8. An honest explanation is necessary to resolve this issue, not a letter of direction that will not reveal what Trudeau knows about physical assets the FTC has identified.

**III. Conclusion**

The FTC respectfully requests that the Court give consumers the best chance at prompt redress by proceeding with its order imposing coercive sanctions until Trudeau satisfies the established purge conditions. As the FTC has stated already, if the Court concludes that Trudeau has honestly disclosed everything he knows concerning his assets, and thus can do nothing further, then Trudeau should be immediately released.

Dated: October 21, 2013

David O'Toole (dotoole@ftc.gov)  
Federal Trade Commission  
55 West Monroe Street, Suite 1825  
Chicago, Illinois 60603-5001  
Phone: (312) 960-5601  
Fax: (312) 960-5600

Respectfully Submitted,

/s/ Jonathan Cohen  
Michael Mora (mmora@ftc.gov)  
Jonathan Cohen (jcohen2@ftc.gov)  
Amanda B. Kostner (akostner@ftc.gov)  
Federal Trade Commission  
600 Pennsylvania Ave., N.W. M-8102B  
Washington, DC 20580  
Phone: 202-326-3373; -2551; -2880  
Fax: 202-326-2551

**CERTIFICATE OF SERVICE**

I, Jonathan Cohen, hereby certify that on October 21, 2013, I caused to be served true copies of the foregoing by electronic means, by filing such documents through the Court's Electronic Case Filing System, which will send notification of such filing to:

Kimball Richard Anderson  
kanderson@winston.com

Thomas Lee Kirsch, II  
tkirsch@winston.com

Katherine E. Rohlf  
kcroswell@winston.com

Blair R. Zanzig  
bzanzig@hwzlaw.com

/s/ Jonathan Cohen  
Jonathan Cohen (jcohen2@ftc.gov)  
Attorney for Plaintiff  
Federal Trade Commission

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

_____	)	
FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 03-C-3904
	)	
v.	)	Hon. Robert W. Gettleman
	)	
KEVIN TRUDEAU,	)	
	)	
Defendant.	)	
	)	
_____	)	

**EXHIBITS RELATED TO  
FTC'S STATEMENT CONCERNING DEFENDANT'S LETTERS OF DIRECTION**

**FTC**  
**EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 03-C-3904
	)	
v.	)	Hon. Robert W. Gettleman
	)	
KEVIN TRUDEAU,	)	
	)	
Defendant.	)	
	)	
	)	

**DECLARATION OF JONATHAN COHEN  
RELATED TO FTC'S STATEMENT CONCERNING  
DEFENDANT'S LETTERS OF DIRECTION**

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

(1) I am co-counsel for Plaintiff Federal Trade Commission ("FTC") in the above-captioned action, and I have personal knowledge of the matters contained herein.

(2) Attached hereto as **Attachment 1** is a true and correct copy of a statement of GIN Foundation "Cash Receipts and Disbursements" the Receiver prepared and filed on September 6, 2013 (DE750-1).

(3) Attached hereto as **Attachment 2** are true and correct copies of emails between Neil Sant, Kevin Trudeau, and Buzz Barlow, produced to the FTC by Website Solutions USA, bates no. 15601-02.

(4) Attached hereto as **Attachment 3** is a true and correct copy of Kevin Trudeau's correspondence with the Global Bank of Commerce, which Trudeau filed on October 11, 2013 (DE766-1).

(5) Attached hereto as **Attachment 4** is a true and correct copy of a document prepared by the Receiver entitled "Consolidated Statements of Balance Sheet," which the Receiver filed on September 6, 2013 (DE747-2).

(6) Attached hereto as **Attachment 5** is a true and correct copy of a document prepared by the Receiver and provided to the FTC, entitled "Transactions by Account" for Trustar Productions Inc.

(7) Attached hereto as **Attachment 6** is a true and correct copy of a series of emails produced by Website Solutions USA between Kevin Trudeau, Neil Sant, and Marc Lane, including a June 4, 2010 email (bates no. WSU018856).

(8) Attached hereto as **Attachment 7** is a true and correct copy of a series of emails produced by Website Solutions USA, including an August 25, 2010 email from Kevin Trudeau to Neil Sant (bates no. WSU019483).

(9) Attached hereto as **Attachment 8** is a true and correct copy of a series of emails produced by Website Solutions USA, including a June 2, 2010 email from Marc Lane to Kevin Trudeau (bates no. WSU018675).

(10) Attached hereto as **Attachment 9** is a true and correct copy of a December 10, 2012 email and attachment from Kevin Trudeau to Neil Sant and Jeff Devine, produced by Website Solutions USA (bates no. WSU000937-38).

(11) Attached hereto as **Attachment 10** is a true and correct copy of a web image captured from <http://companycheck.co.uk> concerning "Future Transactions Company Limited" (viewed Oct. 18, 2013).

(12) Attached hereto as **Attachment 11** is a true and correct copy of a wire record produced by the Law Offices of Marc J. Lane, and introduced at the evidentiary hearing in the above-captioned action as FTCX 12EE.

(13) Attached hereto as **Attachment 12** is a true and correct copy of a September 18, 2013 letter from Kevin Trudeau to Lee Kenny, which Trudeau filed on October 11, 2013 (DE766-1).

(14) Attached hereto as **Attachment 13** is a true and correct copy of an October 10, 2008 invoice from Rosland Capital.

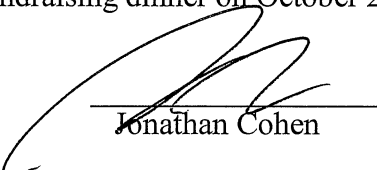
(15) Attached hereto as **Attachment 14** is a true and correct copy of a \$110,050 check payable to Rosland Capital.

(16) Attached hereto as **Attachment 15** is a true and correct copy of a wire record filed by the Receiver on or about September 16, 2013.

(17) On October 18, 2012, I listened to a teleconference between Kevin Trudeau, his attorneys, and the Receiver's representatives. During that call, Trudeau proposed to send "letters of direction" to various persons and entities to confirm that he does not have any unknown accounts. Trudeau further proposed to "send a letter to every bank in the world."

(18) Trudeau also proposed to sit down with the Receiver's representatives and "spend hours" reviewing financial documents at the 130 Quail Ridge Drive offices, which Trudeau stated might "jog my memory." Trudeau further stated that his role as a creative person was similar to Oprah Winfrey in that he did not manage his financial affairs personally. Trudeau further stated that, like Winfrey, "I don't know anything about the money coming in and going out."

(19) Trudeau stated that he will attend a fundraising dinner on October 20 and another fundraising event on October 21.

  
Jonathan Cohen

Executed on October 21, 2013 in Washington, D.C.

**FTC PXA:1**

Cash Receipts & Disbursements  
January 1 through September 6, 2013

	GBP	Ave. Exch Rate	USD	USD	TOTAL
<b>Income</b>					
NBX Merchant Services Inc.	1,989,368.45	1.5418	3,067,208.28	11,137,822.31	14,205,030.59
<b>Related Parties</b>					
GIN USA Inc.	0.00	1.5418	0.00	301,619.32	301,619.32
<b>Future Transactions Company</b>					
Money In	0.00	1.5418	0.00	1,317,923.20	1,317,923.20
Money Out	(46,329.00)	1.5418	(71,430.05)	(996,462.41)	(1,067,892.46)
<b>Total Future Transactions Company</b>	(46,329.00)		(71,430.05)	321,460.79	250,030.74
<b>Global Information</b>	0.00	1.5418	0.00	152,396.31	152,396.31
<b>Total Related Parties</b>	(46,329.00)		(71,430.05)	775,476.42	704,046.37
<b>Deposits to be determined</b>					
Deposits to be determined	0.00	1.5418	0.00	166,545.56	166,545.56
Collection	0.00	1.5418	0.00	163,236.54	163,236.54
<b>Total Deposits to be determined</b>	0.00		0.00	329,782.10	329,782.10
<b>Credit Suisse AG</b>	0.00	1.5418	0.00	164,398.63	164,398.63
<b>Maximum Value Promtions, LLC</b>	0.00	1.5418	0.00	85,365.51	85,365.51
<b>The Hybrid Group Inc.</b>					
Money In	0.00	1.5418	0.00	802,948.44	802,948.44
Money Out	0.00	1.5418	0.00	(740,560.95)	(740,560.95)
<b>Total The Hybrid Group Inc.</b>	0.00		0.00	62,387.49	62,387.49
<b>Bruno Lacroix</b>	0.00	1.5418	0.00	30,150.00	30,150.00
<b>Madame Martin Denise</b>	0.00	1.5418	0.00	27,195.18	27,195.18
<b>Barbara Annemarie Hagmayer</b>	0.00	1.5418	0.00	25,000.00	25,000.00
<b>Caroline De Champeaux</b>	0.00	1.5418	0.00	24,989.06	24,989.06
<b>Joelle Bernard</b>	0.00	1.5418	0.00	20,000.00	20,000.00
<b>Vigneau Dufour Brigitte</b>	0.00	1.5418	0.00	18,988.94	18,988.94
<b>Melle Farida aka Diri</b>	0.00	1.5418	0.00	15,435.52	15,435.52
<b>Payment Services Directive</b>	0.00	1.5418	0.00	11,187.00	11,187.00
<b>France Conseil Paris</b>	0.00	1.5418	0.00	10,000.00	10,000.00
<b>Snocope Credit Union</b>	0.00	1.5418	0.00	981.46	981.46
<b>Chermette Lau</b>	0.00	1.5418	0.00	966.95	966.95
<b>Total Income</b>	1,943,039.45		2,995,778.22	12,740,126.57	15,735,904.79
<b>Expense</b>					
International Payment Systems	767,809.00	1.5418	1,183,807.92	5,736,039.08	6,919,847.00
<b>Related Entities</b>					
Website Solutions	470,310.35	1.5418	725,124.50	3,225,708.95	3,950,833.45
<b>Lee Kenny</b>					
American Express	161,158.48	1.5418	248,474.14	0.00	248,474.14
Lee Kenny - Other	131,803.21	1.5418	203,214.19	28,810.94	232,025.13
<b>Total Lee Kenny</b>	292,961.69		451,688.33	28,810.94	480,499.27
<b>Natalia Babenko</b>	0.00	1.5418	0.00	149,051.82	149,051.82
<b>PL Holdings</b>	12,728.64	1.5418	19,625.02	0.00	19,625.02



**Cash Receipts & Disbursements**  
**January 1 through September 6, 2013**

	<u>GBP</u>	Ave. Exch Rate	<u>USD</u>	<u>USD</u>	<u>TOTAL</u>
Natural Cures Health institute	0.00	1.5418	0.00	12,362.55	12,362.55
<b>Total Related Entities</b>	<u>776,000.68</u>		1,196,437.85	3,415,934.26	4,612,372.11
<b>Global Sales Solutions</b>					
Money Out	388,872.50	1.5418	599,563.62	884,916.32	1,484,479.94
Money In	<u>(9,034.57)</u>	1.5418	<u>(13,929.50)</u>	<u>(109,913.78)</u>	<u>(123,843.28)</u>
<b>Total Global Sales Solutions</b>	379,837.93		585,634.12	775,002.54	1,360,636.66
NCL (Bahamas) Ltd.	0.00	1.5418	0.00	865,076.01	865,076.01
Winston and Strawn LLP	25,495.23	1.5418	39,308.55	507,399.48	546,708.03
Office Pool	311,496.97	1.5418	480,266.03	164,461.67	644,727.70
Netovative LLC	68,942.34	1.5418	106,295.30	330,230.57	436,525.87
CardFlex	109,355.00	1.5418	168,603.54	196,731.32	365,334.86
Receiver	2,720.50	1.5418	4,194.47	258,032.56	262,227.03
Marc Lane	85,255.73	1.5418	131,447.28	140,222.86	271,670.14
WP Buz Barlow	19,158.44	1.5418	29,538.48	100,153.86	129,692.34
Budds Gunisao Lake	0.00	1.5418	0.00	95,009.02	95,009.02
Snowflake Information Services	74,598.31	1.5418	115,015.67	15,758.38	130,774.05
Faruki Ireland & Cox P.L.L.	0.00	1.5418	0.00	63,840.76	63,840.76
Law Office of D????	0.00	1.5418	0.00	20,038.05	20,038.05
Snowflake Media Ltd.	14,683.52	1.5418	22,639.05	0.00	22,639.05
Element Lifestyle	0.00	1.5418	0.00	9,134.81	9,134.81
Payments to be identified	0.00	1.5418	0.00	7,938.00	7,938.00
Jangomail.com	0.00	1.5418	0.00	7,718.69	7,718.69
Mrs. C A Wiseman	0.00	1.5418	0.00	7,674.53	7,674.53
A.D. Properties 64 LLC	0.00	1.5418	0.00	7,674.53	7,674.53
Michael Baer	7,042.16	1.5418	10,857.60	0.00	10,857.60
TLC Promotions, Inc.	0.00	1.5418	0.00	5,037.81	5,037.81
Unikom	3,307.62	1.5418	5,099.69	0.00	5,099.69
Baytree National	0.00	1.5418	0.00	2,724.88	2,724.88
Crozier & Associates	0.00	1.5418	0.00	2,537.79	2,537.79
Paul Reid	2,127.90	1.5418	3,280.80	0.00	3,280.80
Sundry Dr.	0.00	1.5418	0.00	1,783.46	1,783.46
Moore Van Allen	0.00	1.5418	0.00	1,038.10	1,038.10
Salix Data	0.00	1.5418	0.00	686.25	686.25
Sophie Currivan	651.12	1.5418	1,003.90	0.00	1,003.90
Bank Line	434.11	1.5418	669.31	0.00	669.31
Bank Fees	0.00	1.5418	0.00	409.04	409.04
Fosdick Corp	0.00	1.5418	0.00	87.46	87.46
IBC City	0.00	1.5418	0.00	38.46	38.46
<b>Total Expense</b>	<u>2,648,916.56</u>		<u>4,084,099.55</u>	<u>12,738,414.23</u>	<u>16,822,513.78</u>
<b>Net Income</b>	<u>(705,877.11)</u>		<u>(1,088,321.33)</u>	<u>1,712.34</u>	<u>(1,086,608.99)</u>

**FTC PXA:2**

**From:** Neil Sant <neilsant@miint.net>  
**Sent:** Friday, January 18, 2013 9:11 AM  
**To:** 'kevintrudeau@aol.com'  
**Subject:** FW: Status

---

130 Quail Ridge Drive  
Westmont, IL 60559  
T: 630 468-2460  
F: 630 468-2461

---

**From:** W P Barlow Jr. [mailto:████████████████████]  
**Sent:** Thursday, January 17, 2013 10:53 PM  
**To:** Neil Sant  
**Subject:** FW: Status

Neil:

Thank you very much for the wire transfer.

Had a lengthy conversation today with a high ranking FTC staff member based on introduction from previous administrator; he listened respectfully, promised to review further (not aware of the pending litigation prior to the call) but didn't make any promises with regard to timing even though advised of the urgency of the matter. Heard from the office of current House member on oversight committee that we've been pursuing and they declined to intercede on Kevin's behalf; said they had given careful consideration but wouldn't state specifically why they wouldn't act. Still are working two other offices on Senate side. Had an excellent conversation with official at Washington lobbying group and she thinks they can help; will talk with team leader on Monday after likely return from his time off due to the flu. I anticipate going to Washington after the Inauguration and working the Hill personally based on appointments being set up. Will speak with another former Congressman in California tomorrow as most of the District is focused on the weekend's celebrations.

Are you making progress with your legal strategy? Has any of the timing changed?

All the best, Buz

---

**From:** ████████████████████  
**To:** [neilsant@miint.net](mailto:neilsant@miint.net)  
**Subject:** Status  
**Date:** Tue, 15 Jan 2013 00:06:24 -0600

Neil:

Had an in depth conversation today with a former FTC Commissioner (not a staff person- Presidential appointee) who offered several suggestions with respect to an approach to the Agency, insight into their thinking in similar matters and identity of a current Commissioner (another Presidential appointee) who worked for him at one time and who could be contacted for a real assessment of what we might do to get them to initiate a pullback on the litigation. I will make that call first thing in the morning. Also will be following up with a major lobbying group in Washington which has several former FTC employees working for them and the top administrator of a Senate office. Still waiting to hear from the Chairman of a House committee with oversight responsibility- they have been doing a due diligence for almost two weeks. Friday is scheduled for a visit with a former Representative (from California, just left office with the swearing in of the new Congress) who is very familiar with the FTC and who believes they are really overreaching and pursuing matters outside their authority. He's not a fan of theirs. We're tracking down all leads in an attempt to motivate a person with

**PXA:2**

enough clout, willingness and ability to act immediately on Kevin's behalf.

I have paid and committed further fees to three persons who are assisting in the search and anticipate the necessity of paying out the majority of the final retainer installment in the near future. Given this, I'd appreciate remittance made as agreed upon for Tuesday to the same domestic bank account you used in December. Thank you very much.

More tomorrow.

Regards, Buz

**FTC PXA:3**

**Sullivan, Andrew C.**

---

**From:** Kevin Trudeau <[REDACTED]>  
**Sent:** Monday, September 30, 2013 3:09 PM  
**To:** Kenton Johnson; [REDACTED]  
**Cc:** Kirsch, Thomas L.; Sullivan, Andrew C.  
**Subject:** Fwd:  
**Attachments:** GBC - Account Opening Package.pdf

Kevin Trudeau

— Forwarded message from "Nicolette Lewis" [REDACTED] —  
Date: Mon, 30 Sep 2013 16:00:09 +0000  
Subject:  
To: [REDACTED]  
Cc: "Beverly Hector" [REDACTED]

Good Day Mr. Trudeau,

After checking our records, there is no evidence to indicate you are a signatory or account holder in our books. I have attached our account opening documentation for your perusal, so the account can be established this time around.

Kindest regards,

*Nicolette Lewis*

**Senior Client Relations & Card Officer**

**Global Bank of Commerce, Ltd**

[REDACTED]

[REDACTED]

**St. John's, Antigua**

**Tel:** [REDACTED]

**Fax:** [REDACTED]

**Website:** [www.globalbankofcommerce.com](http://www.globalbankofcommerce.com)

**From:** Kevin Trudeau [REDACTED]  
**Sent:** Friday, September 27, 2013 11:56 AM  
**To:** CSR Email  
**Subject:** RE:

fax sent yesterday. I do not think an account was ever opened for me...just chekcing

Kevin Trudeau

On 9/26/2013 at 9:09 AM, "CSR Email" [REDACTED] > wrote:

Good Day

Thank you for your mail to us.

Kindly forward a singed fax addressed to Global Bank of Commerce requesting the details and we will respond to you accordingly.

Regards

Beverly Hector

Senior Operations Officer

Global Bank of Commerce

[REDACTED]

[REDACTED]

[REDACTED]

Tel: [REDACTED]

Fax: [REDACTED]

Email [REDACTED]

Website: [www.globalbank.ag](http://www.globalbank.ag)

**From:** Kevin Trudeau [REDACTED] 1  
**Sent:** Thursday, September 26, 2013 9:04 AM  
**To:** CSR Email  
**Cc:** Kenton Johnson; Thomas L. Kirsch  
**Subject:**

Can you tell me if I have an account at your bank or if I am a signer on any account at your bank?

Thank you

Kevin Trudeau



**FTC PXA:4**

Affiliated Entities with Kevin Trudeau  
Summarized & Prepared Based on QuickBooks Accounting Records Provided by Each Entity

Assets	GIN USA		GIN Foundation		Website Solutions		Natural Cures		KI Radio		KT Corp		TruStar Productions		Trudeau Approved Products		Int'l Pool Tour		Totals
	Mar 19, 13	0.00	Jul 22, 13	0.00	Aug 6, 13	0.00	Jul 24, 13	0.00	Aug 6, 13	0.00	May 1, 13	0.00	Jul 31, 13	0.00	Aug 7, 13	0.00	May 11, 13	0.00	
<b>Current Assets</b>																			
Checking/Saving	0.00	1,415,403.78	412,191.27	99,704.74	4,420.08	2,997.75	1,376.72	99,739.93	1,003.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,036,837.99
A/R Optimal	0.00	905,872.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	905,872.53
<b>Other Current Assets</b>																			
Accounts Receivable	0.00	0.00	17,663.85	182.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,107,386.35	0.00	4,125,232.70
Reserve Account - Optimal	0.00	1,879,230.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1,879,230.75
Inventory	0.00	0.00	0.00	205,052.25	242,017.46	0.00	0.00	1,447,453.48	210,391.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,104,914.29
Deposits	0.00	0.00	5,996.50	0.00	2,500.00	0.00	0.00	20,007.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	28,504.00
Prepaid Expenses	0.00	0.00	20,296.22	0.00	0.00	0.00	0.00	1,533.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21,829.70
Invest-Gray Krauss Des Rochers*	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15,000.00
Invest-Triumph Dig. Media Adv.	0.00	0.00	150,000.00	0.00	0.00	0.00	0.00	100,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	250,000.00
<b>Total Current Assets</b>	<b>0.00</b>	<b>4,200,507.06</b>	<b>606,147.84</b>	<b>304,939.58</b>	<b>248,937.54</b>	<b>2,997.75</b>	<b>116,376.72</b>	<b>1,568,734.39</b>	<b>4,318,781.05</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>11,367,421.91</b>
<b>Fixed Assets</b>																			
601 Del Oro	0.00	0.00	0.00	0.00	0.00	840,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	840,000.00
601 Del Oro - Furnitures & Improvements	0.00	0.00	0.00	0.00	0.00	119,233.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	119,233.44
Personal Property	0.00	0.00	0.00	0.00	0.00	0.00	143,750.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	143,750.00
Other Fixed Assets	0.00	0.00	15,927.90	0.00	0.00	58,548.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	74,476.78
Computer Hardware & Equipment	0.00	0.00	20,243.42	0.00	0.00	0.00	0.00	4,398.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24,642.29
Furnishings & Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,732.92	76,371.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	80,103.92
Photographic	0.00	0.00	5,225.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5,225.54
Production Equipment	3,262.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3,262.24
<b>Total Fixed Assets</b>	<b>3,262.24</b>	<b>0.00</b>	<b>41,396.86</b>	<b>0.00</b>	<b>0.00</b>	<b>1,017,782.32</b>	<b>143,750.00</b>	<b>8,131.79</b>	<b>76,371.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,290,694.40</b>
<b>Other Assets</b>																			
Due from																			
Website Solutions	16,269,131.60	5,332,921.83	0.00	410,015.29	7,959,288.85	0.00	12,868.03	0.00	10,000.00	(29,994,225.60)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GIN Foundation	5,592,645.49	0.00	7,798,703.26	2,106,298.36	531,603.00	0.00	0.00	0.00	0.00	(16,029,250.11)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GIN USA	0.00	1,554,390.45	11,822,022.37	217,208.00	307,953.98	0.00	0.00	0.00	0.00	(13,901,574.80)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Cures	5,276,199.49	0.00	645,800.14	0.00	4,902,425.90	0.00	4,596.10	96,661.22	0.00	(10,925,043.67)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	639.15
KT Radio	4,882,239.89	13,912,026.84	346,566.56	780.00	0.00	0.00	0.00	0.00	0.00	(19,141,613.29)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
KT Corp	13,500.00	0.00	30,148.59	708,110.98	6,800.00	0.00	850.00	0.00	0.00	(759,409.57)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
International Pool Tour	1,085,200.00	253,000.00	125,266.79	3,043,734.91	933,100.00	205,446.83	2,621,540.26	0.00	0.00	(8,267,288.79)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Trudeau Approved Products	1,392,469.33	0.00	1,392,370.05	0.00	150.24	0.00	0.00	0.00	0.00	(2,784,989.62)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TruStar Productions	0.00	0.00	11,978.99	1,926,409.71	2,000.00	0.00	0.00	0.00	0.00	(1,940,364.70)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	24.00
Trudeau Management	0.00	0.00	0.00	45,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	45,000.00
TruStar Marketing	0.00	0.00	0.00	112,000.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	112,000.00
Trucom	10,000.00	0.00	1,352.75	3,793,129.20	12,000.00	0.00	335,088.45	0.00	0.00	4,151,570.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4,151,570.40
Website Solutions Switzerland	0.00	0.00	83,250.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	83,250.00

**Consolidated Statements of Balance Sheet**

**Affiliated Entities with Kevin Trudeau**  
Summarized & Prepared Based on QuickBooks Accounting Records Provided by Each Entity

	GIN USA	GIN Foundation	Website Solutions	Natural Cures	KT Radio	KT Corp	TruStar Productions	Trudeau Approved Products	Int'l Pool Tour	Elimination	Totals
	Mar 19, 13	Jul 22, 13	Aug 6, 13	Jul 24, 13	Aug 6, 13	May 1, 13	Jul 31, 13	Aug 7, 13	May 11, 13		
Alliance Publishing	0.00	0.00	0.00	1,633,895.15	712.98	0.00	20,000.00	0.00	70,000.00		1,724,608.13
Kevin Trudeau	2,000,000.00	0.00	1,361,168.55	1,845,293.17	20,150.97	2,726.82	2,226,729.29	0.00	2,251,242.87		9,707,311.67
Nataliya Babenko	0.00	0.00	523,243.39	0.00	978,347.00	0.00	0.00	0.00	0.00		1,501,590.39
Trudeau Associates	0.00	0.00	0.00	0.00	0.00	0.00	85,000.00	0.00	0.00		85,000.00
ITV Global	0.00	0.00	0.00	295,281.91	0.00	0.00	0.00	0.00	0.00		295,281.91
Natural Cures Health Institute	0.00	0.00	31,946.64	80,002.66	0.00	0.00	0.00	0.00	0.00		111,949.30
KT Capital	0.00	0.00	4,402.09	58,288.60	0.00	214,361.05	0.00	0.00	0.00		277,051.74
Shop America	0.00	0.00	0.00	0.00	0.00	385,500.00	45,209.40	0.00	0.00		430,709.40
Direct Response	0.00	0.00	0.00	27,159.10	0.00	75,101.87	0.00	0.00	0.00		102,260.97
Total Due to	36,521,385.80	21,052,339.12	24,178,220.17	16,302,607.04	15,654,532.92	883,136.57	5,351,881.53	96,661.22	2,331,242.87		18,628,247.00
Other Assets	0.00	0.00	0.00	(910.00)	36,000.00	480,983.00	0.00	0.00	0.00		516,073.00
<b>Total Other Assets</b>	<b>36,521,385.80</b>	<b>21,052,339.12</b>	<b>24,178,220.17</b>	<b>16,301,697.04</b>	<b>15,690,532.92</b>	<b>1,364,119.57</b>	<b>5,351,881.53</b>	<b>96,661.22</b>	<b>2,331,242.87</b>		<b>19,144,320.02</b>
<b>Total Assets</b>	<b>36,524,648.04</b>	<b>25,252,846.18</b>	<b>24,825,764.87</b>	<b>16,606,636.62</b>	<b>15,939,470.46</b>	<b>2,384,899.64</b>	<b>5,612,008.25</b>	<b>1,673,527.40</b>	<b>6,726,394.92</b>		<b>31,802,436.28</b>
<b>Liabilities &amp; Equity Liabilities</b>											
<b>Current Liabilities</b>											
Accounts Payable	7,976,315.59	81,975.36	279,528.92	78,324.94	14,040.57	3,234.16	21,474.37	156,010.46	1,158,390.04		9,769,294.41
Accrued Expenses	0.00	0.00	0.00	0.00	400,000.00	0.00	0.00	69,122.35	583,984.29		1,053,106.64
Accrued Tax & Withholding	481,330.70	209,267.70	0.00	0.00	0.00	0.00	0.00	(497,385.09)	(39,118.05)	486,546.00 B	640,641.21
Others	14,424.85	0.00	0.00	0.00	0.00	0.16	0.00	0.00	0.00		14,425.01
<b>Total Current Liabilities</b>	<b>8,472,071.14</b>	<b>291,243.06</b>	<b>279,528.92</b>	<b>78,324.94</b>	<b>414,040.57</b>	<b>3,234.32</b>	<b>21,474.37</b>	<b>(272,252.28)</b>	<b>1,703,256.28</b>		<b>11,477,467.33</b>
<b>Long Term Liabilities</b>											
VC Loan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2,197,200.00		2,197,200.00
Other Long-Term Liabilities	0.00	0.00	0.00	(2,116.18)	0.00	0.00	5,000.00	0.00	8,500.00		11,383.82
Due To											
Website Solutions	11,822,022.37	7,798,703.26	0.00	645,160.96	346,566.56	30,148.59	11,954.99	1,392,370.05	125,266.79	(22,172,193.57) A	0.00
GIN Foundation	1,554,390.45	0.00	5,332,921.83	0.00	13,912,026.84	0.00	0.00	0.00	253,000.00	(21,052,339.12) A	0.00
GIN USA	0.00	5,592,645.49	16,269,131.60	5,276,199.49	4,882,239.89	13,500.00	0.00	1,392,469.33	1,085,200.00	(34,511,385.80) A	0.00
Natural Cures	217,208.00	2,106,298.36	410,015.29	0.00	780.00	708,110.98	1,926,409.71	0.00	3,043,734.91	(8,412,557.25) A	0.00
KT Radio	307,953.98	531,603.00	7,959,288.85	4,902,425.90	0.00	6,800.00	2,000.00	150.24	933,100.00	(14,643,321.97) A	0.00
KT Corp	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	205,446.83	(205,446.83) A	0.00
TruStar Productions	0.00	0.00	12,868.03	4,596.10	0.00	850.00	0.00	0.00	2,621,540.26	(2,639,854.39) A	0.00
International Pool Tour	0.00	0.00	10,000.00	0.00	0.00	0.00	0.00	0.00	0.00	(10,000.00) A	0.00
Trudeau Approved Product	0.00	0.00	0.00	96,661.22	0.00	0.00	0.00	0.00	0.00	(96,661.22) A	0.00
Kevin Trudeau	602,661.78	998,098.50	0.00	0.00	0.00	2,783,629.62	0.00	0.00	1,129,485.44		5,513,875.34
Alliance Publishing	0.00	0.00	0.00	0.00	0.00	738,000.00	1,017.31	0.00	2,920,408.41		3,659,425.72
Trucom	0.00	0.00	0.00	0.00	0.00	1,069,700.00	0.00	0.00	2,873,005.81		3,942,705.81



**Affiliated Entities with Kevin Trudeau**  
Summarized & Prepared Based on QuickBooks Accounting Records Provided by Each Entity

	GIN USA		GIN Foundation		Website Solutions		Natural Cures		KT Radio		KT Corp		Trustar Productions		Trudeau Approved Products		Int'l Pool Tour		Elimination	Totals
	Mar 19, 13	0.00	Jul 22, 13	0.00	Aug 6, 13	0.00	Jul 24, 13	0.00	Aug 6, 13	0.00	May 1, 13	0.00	Jul 31, 13	0.00	Aug 7, 13	0.00	May 11, 13	0.00		
Trudeau Management	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	114,342.53		114,342.53	
KT Capital	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	116.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		116.00	
Shop America	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	144,500.00		144,500.00	
Natural Cures Health Institute	0.00	0.00	0.00	0.00	0.00	62,879.11	62,879.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		62,879.11	
	14,504,236.58	17,027,348.61	29,994,225.60	10,987,922.78	19,141,613.29	19,141,613.29	5,350,855.19	1,941,382.01	2,784,989.62	15,449,030.98									13,437,844.53	
<b>Total Long Term Liabilities</b>	<b>14,504,236.58</b>	<b>17,027,348.61</b>	<b>29,994,225.60</b>	<b>10,985,806.60</b>	<b>19,141,613.29</b>	<b>19,141,613.29</b>	<b>5,350,855.19</b>	<b>1,946,382.01</b>	<b>2,784,989.62</b>	<b>17,654,730.98</b>									<b>15,646,428.31</b>	
<b>Total Liabilities</b>	<b>22,976,307.72</b>	<b>17,318,591.67</b>	<b>30,273,754.52</b>	<b>11,064,131.54</b>	<b>19,555,653.86</b>	<b>19,555,653.86</b>	<b>5,354,089.51</b>	<b>1,967,856.38</b>	<b>2,512,737.34</b>	<b>19,357,987.26</b>									<b>27,123,895.61</b>	
<b>Equity</b>																				
Retained Earnings Adjustment	0.00	0.00	0.00	5,340,411.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		5,340,411.00	
Opening Bal Equity	0.00	0.00	0.00	63,665.22	0.00	0.00	(2,460,100.64)	2,868,789.45	0.00	(13,634,043.88)									(13,161,689.85)	
Net Income	13,548,340.32	7,934,254.51	(5,447,989.65)	138,428.86	(3,616,183.40)	(509,089.23)	775,362.42	(839,209.94)	1,002,451.54										12,499,819.43	
<b>Total Equity</b>	<b>13,548,340.32</b>	<b>7,934,254.51</b>	<b>(5,447,989.65)</b>	<b>5,542,505.08</b>	<b>(3,616,183.40)</b>	<b>(2,969,189.87)</b>	<b>3,644,151.87</b>	<b>(839,209.94)</b>	<b>(12,631,592.34)</b>										<b>4,678,540.58</b>	
<b>Total Liabilities &amp; Equity</b>	<b>36,524,648.04</b>	<b>25,252,846.18</b>	<b>24,825,764.87</b>	<b>16,606,636.62</b>	<b>15,939,470.46</b>	<b>2,384,899.64</b>	<b>5,612,008.25</b>	<b>1,673,527.40</b>	<b>6,726,394.92</b>										<b>31,802,436.21</b>	

**Note:** The adjustments marked as A are the reconciliation of the inter-company transactions recorded under "Due From" and "Due To" on the books of each entity. The adjustment marked as B is the reversal of the entry, which was recorded to other income and resulted in a negative balance in accrued taxes. This entry was initially recorded by the Company for the accrued income tax and income tax expense and had no cash impact.

**FTC PXA:5**

Transactions by Account  
All Transactions

Due From (New)	Type	Date	Num	Adj	Name	Memo	Class	Clr	Split	Debit	Credit	Balance
Kevin Trudeau	Bill	02/24/2006			Shop America USA				Accounts Payable	100,000.00		100,000.00
	General Journal	07/01/2007				PrePaid Royalty Expensed			Royalty Expense		100,000.00	0.00
	Bill	02/29/2008			Trudeau, Kevin				Accounts Payable	110,000.00		110,000.00
	Bill	03/04/2008			Trudeau, Kevin				Accounts Payable	100,000.00		210,000.00
	Check	03/14/2008	2023		Trudeau, Kevin				PNC Operating - 5128	260,000.00		470,000.00
	Check	04/14/2008	2025		Trudeau, Kevin				PNC Operating - 5128	100,000.00		570,000.00
	Bill	04/25/2008			Trudeau, Kevin				Accounts Payable	220,000.00		790,000.00
	Bill	04/29/2008			Trudeau, Kevin				Accounts Payable	90,000.00		880,000.00
	Bill	04/30/2008			Trudeau, Kevin				Accounts Payable	80,000.00		960,000.00
	Bill	05/02/2008			Trudeau, Kevin				Accounts Payable	10,000.00		970,000.00
	Bill	05/16/2008			Trudeau, Kevin				Accounts Payable	120,000.00		1,090,000.00
	Bill	05/23/2008			Trudeau, Kevin				Accounts Payable	140,000.00		1,230,000.00
	Bill	06/04/2008			Trudeau, Kevin				Accounts Payable	145,000.00		1,375,000.00
	Bill	06/13/2008			Trudeau, Kevin				Accounts Payable	5,000.00		1,380,000.00
	Bill	07/01/2008			Trudeau, Kevin				Accounts Payable	114,000.00		1,494,000.00
	Check	07/26/2008	2043		Trudeau, Kevin				PNC Operating - 5128	100,000.00		1,594,000.00
	Bill	08/01/2008			Trudeau, Kevin				Accounts Payable	50,000.00		1,644,000.00
	Bill	08/14/2008			Trudeau, Kevin				Accounts Payable	50,000.00		1,694,000.00
	Check	08/22/2008	2045		Trudeau, Kevin				PNC Operating - 5128	20,000.00		1,714,000.00
	Check	08/23/2008	2046		Trudeau, Kevin				PNC Operating - 5128	200,000.00		1,914,000.00
	Check	09/05/2008	2049		Trudeau, Kevin				PNC Operating - 5128	80,000.00		1,994,000.00
	Bill	09/12/2008			Trudeau, Kevin				Accounts Payable	20,000.00		2,014,000.00
	Bill	09/18/2008			Trudeau, Kevin				Accounts Payable	65,000.00		2,079,000.00
	Bill	09/25/2008			Trudeau, Kevin				Accounts Payable	76,000.00		2,155,000.00
	Bill	10/02/2008			Trudeau, Kevin				Accounts Payable	175,000.00		2,330,000.00
	Bill	10/17/2008			Trudeau, Kevin				Accounts Payable	17,000.00		2,347,000.00
	Check	06/14/2009			Discover Card - 4744				PNC Operating - 5128	247.00		2,347,247.00
	Bill	07/30/2009			Discover Card - 4744				Accounts Payable	253.00		2,347,500.00
	Bill	07/31/2009			Chase - 4688, 2945				Accounts Payable	556.59		2,348,056.59
	Bill	07/31/2009			Discover Card - 4744				Accounts Payable	290.00		2,348,346.59
	Bill	08/01/2009			Bank of America - 0819/8024				Accounts Payable	1,200.00		2,349,546.59
	Bill	08/02/2009			Bank of America - 0819/8024				Accounts Payable	545.76		2,350,092.35
	Bill	08/13/2009			American Express - 81003				Accounts Payable	1,018.43		2,351,110.78
	Bill	08/16/2009			American Express - 81003				Accounts Payable	17,350.51		2,368,461.29
	Bill	08/27/2009			American Express - 81003				Accounts Payable			2,368,461.29
	Bill	09/17/2009			Bank of America - 0819/8024				Accounts Payable	764.00		2,369,225.29
	Bill	10/11/2009			Discover Card - 4744				Accounts Payable	254.00		2,369,479.29
	Bill	10/18/2009			American Express - 81003				Accounts Payable			2,369,479.29
	Bill	11/08/2009			Chase - 4164				Accounts Payable	1,000.00		2,370,479.29
	Bill	11/19/2009			Chase - 4164				Accounts Payable			2,370,479.29
	General Journal	05/16/2012	KT-032812			Property provided to TruStar reducing the payable from KT on 3/28/12 per Fixed Assets - Personal Propert					143,750.00	2,226,729.29
Total Kevin Trudeau										<u>2,470,479.29</u>	<u>243,750.00</u>	<u>2,226,729.29</u>
Total Due From (New)										<u>2,470,479.29</u>	<u>243,750.00</u>	<u>2,226,729.29</u>
<b>TOTAL</b>										<u><b>2,470,479.29</b></u>	<u><b>243,750.00</b></u>	<u><b>2,226,729.29</b></u>

**FTC PXA:6**

**From:** Neil Sant <neilsant@miint.net>  
**Sent:** Friday, June 4, 2010 5:04 PM  
**To:** 'Kevin Trudeau' <kevintrudeau@aol.com>  
**Subject:** FW: Kiev flat

---

I sent the wire. Here's the math:

Appraised value	\$ 703,676.67
Loan amount	\$ (422,869.65)
Loan paid down via wire	\$ 36,839.75
<b>Equity</b>	<b>\$ 317,646.77</b>
Fees & Penalties part of wire	\$ (100,000.00)
<b>Actual Equity</b>	<b>\$ 217,646.77</b>

130 Quail Ridge Drive  
Westmont, IL 60559  
T: 630 468-2460  
F: 630 468-2461  
neilsant@miint.net

---

**From:** Marc J. Lane [mailto:mlane@marcjlane.com]  
**Sent:** Friday, June 04, 2010 2:26 PM  
**To:** neilsant@miint.net  
**Subject:** RE: Kiev flat

**CONFIDENTIAL COMMUNICATION:**  
**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE**  
**AND WORK PRODUCT IMMUNITY**

Neil,

The appraised value as of April 23, 2010 was US \$703,676.67. The amount outstanding as of March 11, 2010 was US \$422,829.65. I am awaiting an updated balance calculation. Payments are \$5,143.32, payable monthly.

Yesterday, I confirmed to local counsel that the wire will be received on Monday, as Kevin authorized. Given the pending questions, I have now asked whether we might hold off until Tuesday or Wednesday. Counsel advises:

I'm affraid that if Client initiats a wire transfer for the bank early next week BTA-bank may start collecting procedure.

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

WSU018856  
**PXA:6 at 1**



Marc

Marc J. Lane  
The Law Offices of Marc J. Lane, P.C.  
[www.MarcJLane.com](http://www.MarcJLane.com)

Please consider the environment before printing this e-mail.



180 North LaSalle Street  
Suite 2100  
Chicago, IL 60601-2701  
Illinois: (312) 372-1040  
Nationally: (800) 372-1040  
Fax: (312) 346-1040

---

**From:** Neil Sant [mailto:neilsant@miint.net]  
**Sent:** Thursday, June 03, 2010 3:52 PM  
**To:** 'Marc J. Lane'  
**Cc:** 'Kevin Trudeau'  
**Subject:** RE: Kiev flat

Marc,

We need to know the following, please:

- 1) After we pay this, how much is owed on the note?
- 2) When is the next payment due? and are payments due monthly?
- 3) How much is the next payment?
- 4) What is the appraised value of the apartment?

Thanks,  
Neil

130 Quail Ridge Drive  
Westmont, IL 60559  
T: 630 468-2460  
F: 630 468-2461  
neilsant@miint.net

---

**From:** Marc J. Lane [mailto:mlane@marcjlane.com]  
**Sent:** Thursday, June 03, 2010 3:27 PM  
**To:** neilsant@miint.net  
**Cc:** 'Kevin Trudeau'  
**Subject:** RE: Kiev flat

**CONFIDENTIAL COMMUNICATION:**  
**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE**  
**AND WORK PRODUCT IMMUNITY**

Neil,

The figures add up to \$126,044.29. To be safe, you should probably pay \$130,000.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

WSU018857

PXA:6 at 2

This is substantially more than the \$36,839.75 "in arrears" of which local counsel advised me on April 12 and I, in turn, advised Kevin. It also includes "penalty," "court expense" and "term payments" for June and July.

Please note that the total paid will be taxable to Olga at 15%.

Marc

Marc J. Lane  
The Law Offices of Marc J. Lane, P.C.  
[www.MarcLane.com](http://www.MarcLane.com)

Please consider the environment before printing this e-mail.



180 North LaSalle Street  
Suite 2100  
Chicago, IL 60601-2701  
Illinois: (312) 372-1040  
Nationally: (800) 372-1040  
Fax: (312) 346-1040

---

**From:** Neil Sant [mailto:neilsant@miint.net]  
**Sent:** Thursday, June 03, 2010 2:46 PM  
**To:** 'Marc J. Lane'  
**Subject:** RE: Kiev flat

Marc,  
I'm not clear on how much to pay. Can you give me a number please?  
Thanks,  
Neil

130 Quail Ridge Drive  
Westmont, IL 60559  
T: 630 468-2460  
F: 630 468-2461  
neilsant@miint.net

---

**From:** Marc J. Lane [mailto:mlane@marcjlane.com]  
**Sent:** Thursday, June 03, 2010 12:37 PM  
**To:** neilsant@miint.net  
**Cc:** 'Kevin Trudeau'  
**Subject:** Kiev flat

**CONFIDENTIAL COMMUNICATION:**  
**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE**  
**AND WORK PRODUCT IMMUNITY**

Neil,

Here's the payoff info. Please round up the total of the specified amounts to account for any currency exchange-rate variation and to cover remitting bank charges. Since any excess will remain in Olga's account, any "settling up" can be accomplished later.

Marc

Marc J. Lane  
The Law Offices of Marc J. Lane, P.C.  
[www.MarcLane.com](http://www.MarcLane.com)

Please consider the environment before printing this e-mail.



180 North LaSalle Street  
Suite 2100  
Chicago, IL 60601-2701  
Illinois: (312) 372-1040  
Nationally: (800) 372-1040  
Fax: (312) 346-1040

---

**From:** Dmitry Shevchenko [mailto:[aza@salkom.kiev.ua](mailto:aza@salkom.kiev.ua)]  
**Sent:** Thursday, June 03, 2010 4:40 AM  
**To:** 'mlane@marcjlane.com'  
**Subject:** Salkom-bank

Dear Marc,

Following your request we inform you about exact total amount that shall be wired on Monday according to Letter No. 10-5/855 of 03 June, 2010 from BTA Bank (please, find attached):

- penalty in the sum of UAH 551 823, 13 (that is USD 69 629, 80 according to the official course of the National Bank of Ukraine - 1 USD equals to UAH 7, 9251);
- arrears for interest (term and past due) in the sum of USD 47 101, 06;
- court expenses in the sum of UAH 1820, 00 (that is USD 229, 65 according to the official course of the National Bank of Ukraine - 1 USD equals to UAH 7, 9251);
- additional term payments for the credit in the sum equivalent to the payments for June-July 2010 that is USD 9 083, 78.

At this we also need to warn you that currency course may change and respectively may change sums that shall be paid off. Anyway, we suppose any change of currency course shall not considerably influence these sums.

Mode of receiving money by Mrs. Olga money from abroad to pay of the sums indicated above remains the same, i.e. by money transfer in the capacity of charitable assistance into the account of Mrs. Babenko opened in BTA Bank according to the following banking details:

**INTERMEDIARY BANK:**

SWIFT: [REDACTED]  
STANDARD CHARTERED BANK  
NEW YORK, US  
FED ABA: [REDACTED]  
CHIPS ABA: [REDACTED]

**CORRESPONDENT BANK:**

ACC. [REDACTED]  
SWIFT: [REDACTED]  
BTA BANK,  
KYIV, UKRAINE

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

WSU018859

PXA:6 at 4



BENEFICIARY BANK:  
BTA BANK  
KYIV, UKRAINE

No. of account: [REDACTED]

Assignment of account: charitable assistance

Recipient: Babenko Olga Veniaminivna.

At this we need to remind you once more that in accordance with Law of Ukraine "On individual profit tax" Mrs. Olga shall pay 15% of the sum of money transferred into her account.

In case any questions arise, please do not hesitate to contact me.

Yours sincerely,

Dmytro Shevchenko

Director of department  
SALKOM Law Firm

12, Khreschatyk Street  
Kyiv, 01001, Ukraine  
tel./fax: +38 044 2706838  
e-mail: [aza@salkom.kiev.ua](mailto:aza@salkom.kiev.ua)  
<http://www.salkom.ua>

**FTC PXA:7**

**From:** Kevin Trudeau <kevintrudeau@aol.com>  
**Sent:** Wednesday, August 25, 2010 12:35 PM  
**To:** Neilsant@miint.net  
**Subject:** Fwd: Salkom\_Kiev flat\_urgent

---

get from marc the exact payoff amount....I am keen on just paying off the whole loan so natalie owns it outright with no mortgage as this is our "home" in ukraine..and while we are getting that....wire money to olga from elichetsten to cover sept payment

Kevin Trudeau  
# 1 NY Times Bestselling Author  
[www.naturalcures.com](http://www.naturalcures.com)  
[www.ktradionetwork.com](http://www.ktradionetwork.com)  
[www.globalinformationnetwork.com](http://www.globalinformationnetwork.com)

-----Original Message-----

From: Marc J. Lane <mlane@marcjlane.com>  
To: 'Kevin Trudeau' <kevintrudeau@aol.com>  
Cc: neilsant <neilsant@miint.net>  
Sent: Wed, Aug 25, 2010 6:20 pm  
Subject: FW: Salkom\_Kiev flat\_urgent

**CONFIDENTIAL COMMUNICATION:**  
**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE**  
**AND WORK PRODUCT IMMUNITY**

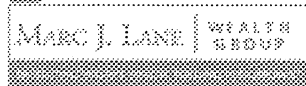
KT,

Kiev counsel's response follows.

Marc

Marc J. Lane  
The Law Offices of Marc J. Lane, P.C.  
[www.MarcJLane.com](http://www.MarcJLane.com)

*Please consider the environment before printing this e-mail.*



180 North LaSalle Street  
Suite 2100  
Chicago, IL 60601-2701  
Illinois: (312) 372-1040  
Nationally: (800) 372-1040  
Fax: (312) 346-1040

---

**From:** Tymofey Sykorskiy [<mailto:ts1@salkom.kiev.ua>]  
**Sent:** Wednesday, August 25, 2010 4:32 AM  
**To:** 'mlane@marcjlane.com'

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

WSU019483  
**PXA:7 at 1**

**Subject:** FW: Salkom\_Kiev flat\_urgent

Dear Marc,

The sum of the first payment that is to be paid immediately is USD 54 349, 00 and consists of the following sums:

- USD 42 560, 00 - the sum of the part of the credit;
- USD 4 700, 00 - interest;
- USD 7 089, 00 - individual profit tax.

This sum shall be paid till 05 September, 2010. But 04 September as well as 05 September are days off and the Bank will not work, thus the payment shall be effected not later than 03 September. It means that Mrs. Olga shall receive the money not later than 02 September so that she could effect payment on 03 September.

There is no possibility to defer payment.

Yes, Nataliya Babenko is the sole owner of the flat.

Moreover, today we have had telephone negotiations with Mrs. Olga. She has informed us that tomorrow Credit Committee of the Bank would take place. In the course of sitting of the Credit Committee the Bank will decide whether to initiate litigation or not.

The Bank will not file an action to the court in case Mrs. Olga agrees to pay off the credit in the course of 12 months. To effect the first payment Mrs. Olga shall receive USD 54 349, 00 not later than 02 September so that she could effect payment on 03 September. Then over a period of the rest 11 months Mrs. Olga shall pay approximately USD 31 649, 09 as well as interest and individual profit tax each month. Only on such conditions the Bank agrees not to file an action to the court.

Taking into consideration that the Credit Committee will take place tomorrow, Mrs. Olga was asked by the Bank to answer **today** (i.e. 25/08/2010) whether the credit will be paid off in the course of 12 months with the first payment till 03 September. In this connection we will kindly ask you to answer as soon as possible whether USD 54 349, 00 will be transferred till 02 September, 2010 into the following account:

**Beneficiary:** Acc. No [REDACTED]  
BABENKO OLGA VENIAMINIVNA

**Bank of Beneficiary:** Open Joint Stock Company RAIFFEISEN BANK AVAL  
Kiev, Ukraine.  
S.W.I.F.T. code: [REDACTED]

**Correspondent bank:** Corr. acc. [REDACTED]  
Wachovia Bank, New York, NY  
S.W.I.F.T. code: [REDACTED]

Looking forward hear from you as soon as possible.

Yours sincerely,

**Tymofey Sykorskiy**

Head of section  
SALKOM Law Firm

12, Khreschatyk Street  
Kyiv, 01001, Ukraine  
tel./fax: +38 044 2706838  
e-mail: [tsl@salkom.kiev.ua](mailto:tsl@salkom.kiev.ua)  
<http://www.salkom.ua>



**FTC PXA:8**

**From:** Kevin Trudeau <kevintrudeau@aol.com>  
**Sent:** Thursday, June 3, 2010 5:11 AM  
**To:** Neilsant@miint.net; mlane@marcjlane.com  
**Subject:** Fwd: Kiev flat - URGENT

---

this needs to be wired today...check with marc for the exact amount

Kevin Trudeau  
# 1 NY Times Bestselling Author  
[www.naturalcures.com](http://www.naturalcures.com)  
[www.ktradionetwork.com](http://www.ktradionetwork.com)  
[www.globalinformationnetwork.com](http://www.globalinformationnetwork.com)

-----Original Message-----

From: Marc J. Lane <mlane@marcjlane.com>  
To: kevintrudeau@aol.com  
Cc: neilsant@miint.net  
Sent: Wed, Jun 2, 2010 1:10 pm  
Subject: Kiev flat - URGENT

**CONFIDENTIAL COMMUNICATION:**  
**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE**  
**AND WORK PRODUCT IMMUNITY**

KT,

Here's a communication from our counsel in Kiev, specifying the sums due and payment instructions.

Anyway, BTA Bank is ready to withdraw the claim in case the following sums are paid off:

- penalty in the sum of UAH 467 097, 51 (that is USD 58 936, 03 according to the official course of the National Bank of Ukraine - 1 USD equals to UAH 7, 9255);
- arrears for interest (term and past due) in the sum of USD 41 381, 64;
- court expenses in the sum of UAH 1820, 00 (that is USD 229, 63 according to the official course of the National Bank of Ukraine - 1 USD equals to UAH 7, 9255);
- additional term payments for the credit in the sum equivalent to the payments for June-July 2010 that is USD 10 261, 31.

At this we also need to warn you that currency course may change and respectively may change sums that shall be paid off. Anyway, we suppose any change of currency course shall not considerably influence these sums.

Regarding mode of receiving money by Mrs. Olga money from abroad to pay of the sums indicated above, BTA Bank proposes to transfer money in the capacity of charitable assistance into the account of Mrs. Babenko opened in BTA Bank according to the following banking details:

**INTERMEDIARY BANK:**  
SWIFT: [REDACTED]  
STANDARD CHARTERED BANK  
NEW YORK, US  
FED ABA [REDACTED]  
CHIPS A [REDACTED]

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

WSU018675  
**PXA:8 at 1**

Marc,  
I'm not clear on how much to pay. Can you give me a number please?  
Thanks,  
Neil

130 Quail Ridge Drive  
Westmont, IL 60559  
T: 630 468-2460  
F: 630 468-2461  
[neilsant@miint.net](mailto:neilsant@miint.net)

---

**From:** Marc J. Lane [<mailto:mlane@marcilane.com>]  
**Sent:** Thursday, June 03, 2010 12:37 PM  
**To:** [neilsant@miint.net](mailto:neilsant@miint.net)  
**Cc:** 'Kevin Trudeau'  
**Subject:** Kiev flat

**CONFIDENTIAL COMMUNICATION:**  
**SUBJECT TO ATTORNEY-CLIENT PRIVILEGE**  
**AND WORK PRODUCT IMMUNITY**

Neil,

Here's the payoff info. Please round up the total of the specified amounts to account for any currency exchange-rate variation and to cover remitting bank charges. Since any excess will remain in Olga's account, any "settling up" can be accomplished later.

Marc

Marc J. Lane  
The Law Offices of Marc J. Lane, P.C.  
[www.MarcLane.com](http://www.MarcLane.com)

*Please consider the environment before printing this e-mail.*



180 North LaSalle Street  
Suite 2100  
Chicago, IL 60601-2701  
Illinois: (312) 372-1040  
Nationally: (800) 372-1040  
Fax: (312) 346-1040

---

**From:** Dmitry Shevchenko [<mailto:aza@salkom.kiev.ua>]  
**Sent:** Thursday, June 03, 2010 4:40 AM  
**To:** '[mlane@marcilane.com](mailto:mlane@marcilane.com)'  
**Subject:** Salkom-bank

Dear Marc,

Following your request we inform you about exact total amount that shall be wired on Monday according to Letter No. 10-5/855 of 03 June, 2010 from BTA Bank (please, find attached):

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY** WWSU018679

**PXA:8 at 2**

- penalty in the sum of UAH 551 823, 13 (that is USD 69 629, 80 according to the official course of the National Bank of Ukraine - 1 USD equals to UAH 7, 9251);
- arrears for interest (term and past due) in the sum of USD 47 101, 06;
- court expenses in the sum of UAH 1820, 00 (that is USD 229, 65 according to the official course of the National Bank of Ukraine - 1 USD equals to UAH 7, 9251);
- additional term payments for the credit in the sum equivalent to the payments for June-July 2010 that is USD 9 083, 78.

At this we also need to warn you that currency course may change and respectively may change sums that shall be paid off. Anyway, we suppose any change of currency course shall not considerably influence these sums.

Mode of receiving money by Mrs. Olga money from abroad to pay of the sums indicated above remains the same, i.e. by money transfer in the capacity of charitable assistance into the account of Mrs. Babenko opened in BTA Bank according to the following banking details:

**INTERMEDIARY BANK:**

SWIFT: [REDACTED]  
STANDARD CHARTERED BANK  
NEW YORK, US  
FED A [REDACTED]  
CHIPS [REDACTED]

**CORRE** [REDACTED]  
ACC. [REDACTED]  
SWIFT: UCTBUAUK  
BTA BANK,  
KYIV, UKRAINE  
**BENEFICIARY BANK:**  
BTA BANK  
KYIV, UKRAINE

**No. of account:** [REDACTED]

**Assignment of account:** charitable assistance

**Recipient:** Babenko Olga Veniaminivna.

At this we need to remind you once more that in accordance with Law of Ukraine "On individual profit tax" Mrs. Olga shall pay 15% of the sum of money transferred into her account.

In case any questions arise, please do not hesitate to contact me.

Yours sincerely,

**Dmytro Shevchenko**

Director of department  
**SALKOM Law Firm**

12, Khreschatyk Street  
Kyiv, 01001, Ukraine  
tel./fax: +38 044 2706838  
e-mail: [aza@salkom.kiev.ua](mailto:aza@salkom.kiev.ua)  
<http://www.salkom.ua>

**Inviato:** giovedì 30 aprile 2009 12.07  
**A:** [kevintrudeau@aol.com](mailto:kevintrudeau@aol.com)  
**Cc:** Francesca (TransTax)  
**Oggetto:** RE:

she is account signature on both accounts. Will ask francesca to prepare the transfer instructions for both transfers and will send them to you for signature by Natalia. Here please note that tomorrow - May 1st - is a public holiday in a lot of European countries. Our offices will be closed and possibly same goes for Hypo. Not sure about GBC.

---

**From:** [kevintrudeau@aol.com](mailto:kevintrudeau@aol.com) [<mailto:kevintrudeau@aol.com>]  
**Sent:** Thursday, April 30, 2009 11:38 AM  
**To:** [mvr@TranstaxLLP.com](mailto:mvr@TranstaxLLP.com)  
**Subject:**

Natalie need to wire \$25k usd out of each of her 2 accounts to Marc Lane. This will be a total of \$50k usd. Can you arrange this please to go out today or tommrrow? If natalie needs to sign anything let me know, she is in Kiev now. many thanks..

---

Big savings on Dell XPS Laptops and Desktops!

\_\_\_\_\_ Informazione NOD32 4045 (20090430) \_\_\_\_\_

Questo messaggio è stato controllato dal Sistema Antivirus NOD32  
<http://www.nod32.it>

Received: from mxes13.enta.net ([127.0.0.1])  
by localhost (mxes13.enta.net [127.0.0.1]) (amavisd-new, port 10024)  
with ESMTTP id 13313-06 for <[mvr@transtaxllp.com](mailto:mvr@transtaxllp.com)>;  
Thu, 30 Apr 2009 11:46:57 +0100 (BST)  
Received: from localhost (localhost.enta.net [127.0.0.1])  
by mxes13.enta.net (Postfix) with ESMTTP id 4D91D8D493B  
for <[mvr@transtaxllp.com](mailto:mvr@transtaxllp.com)>; Thu, 30 Apr 2009 11:46:58 +0100 (BST)  
Received: from office3 (113.3.202.62.fix.bluewin.ch [62.202.3.113])  
by relay-2.smtp.seeweb.it  
(Postfix) with ESMTTP id 1A5F351C81;  
Thu, 30 Apr 2009 12:46:34 +0200 (CEST)  
Received: from relay-2.smtp.seeweb.it (relay-2.smtp.seeweb.it [217.194.8.131])  
by mxes13.enta.net (Postfix) with ESMTTP id 9A8D28D4896  
for <[mvr@transtaxllp.com](mailto:mvr@transtaxllp.com)>; Thu, 30 Apr 2009 11:46:57 +0100 (BST)  
Received: from mxes13.enta.net (mxes13.enta.net [62.249.192.196])  
by pop.freeola.net (Postfix) with ESMTTP id 13B48297377  
for <[mvr@transtaxllp.com](mailto:mvr@transtaxllp.com)>; Thu, 30 Apr 2009 11:46:36 +0100 (BST)  
Return-Path: <[francy@transtaxllp.com](mailto:francy@transtaxllp.com)>  
From: "Francesca" <[francy@transtaxllp.com](mailto:francy@transtaxllp.com)>  
To: <[kevintrudeau@aol.com](mailto:kevintrudeau@aol.com)>  
Cc: "'Michel van Roon'" <[mvr@transtaxllp.com](mailto:mvr@transtaxllp.com)>  
References: <8CB978E6FB4C48F-2674-81@mblk-dl6.sysops.aol.com>  
<3B25C1120AA349A593C7B6B864336897@transtaxmvrdrk>  
Subject: R: transfers  
Date: Thu, 30 Apr 2009 12:46:35 +0200  
Message-ID: <8D5D73CC660B4B19A80ED9FCCD0A270D@office3>  
MIME-Version: 1.0  
Content-Type: multipart/alternative;

**HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY**

WSU018779

PXA:8 at 4

boundary="-----\_NextPart\_000\_0428\_01C9CC96.3758D8A0"  
X-Mailer: Microsoft Office Outlook 11  
X-Original-To: [mvr@transtaxllp.com](mailto:mvr@transtaxllp.com)  
X-Greylist: from auto-whitelisted by SQLgrey-  
X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2900.5579  
In-Reply-To: <3B25C1120AA349A593C7B6B864336897@transtaxmvrkd>  
Thread-Index: AcnJd9d3jbgSZFLgQVO/7mtYMfcZJwAAy1XQAAFFM3A=  
X-Virus-Scanned: amavisd  
-new at enta.net

-----\_NextPart\_000\_0428\_01C9CC96.3758D8A0  
Content-Type: text/plain;  
charset="iso-8859-1"  
Content-Transfer-Encoding: quoted-printable

Dear Mr. Trudeau,

=20

please could you send me the completed addresses of beneficiary and of Bank of America, the Global Bank of Commerce needs to know these information.

=20

Thanks and best regards,

=20

Francesca

=20

\_\_\_\_\_ =20

Da: Michel van Roon [<mailto:mvr@transtaxllp.com>]=20  
Inviato: gioved=EC 30 aprile 2009 12.07  
A: [kevintrudeau@aol.com](mailto:kevintrudeau@aol.com)  
Cc: Francesca (TransTax)  
Oggetto: RE:=20

=20

she is account signature on both accounts. Will ask francesca to prepare the transfer instructions for both transfers and will send them to you for signature by Natalia. Here please note that tomorrow - May 1st - is a public holiday in a lot of European countries. Our offices will be closed and possibly same goes for Hypo. Not sure about GBC.=20

\_\_\_\_\_ =20

From: [kevintrudeau@aol.com](mailto:kevintrudeau@aol.com) [<mailto:kevintrudeau@aol.com>]=20  
Sent: Thursday, April 30, 2009 11:38 AM  
To: [mvr@TransTaxLLP.com](mailto:mvr@TransTaxLLP.com)  
Subject:=20

Natalie need to wire \$25k usd out of each of her 2 accounts to Marc Lane. This will be a total of \$50k usd. Can you arrange this please to go out today or tommrrow? If=20  
Onatalie needs to sign anything let me know, she is in Kiev now. many thanks..=20

=20

today or tommrrow?&nbsp; If natalie needs to sign anything let me know, she=20=  
is in  
Kiev now. many thanks.. <o:p></o:p></span></font></p>

<div id=3DMAILCIAMB038-5bc749f971622d5>

<p class=3DMsoNormal><font size=3D2 color=3Dblack face=3DArial><span style=  
=3D'font-size: 10.0pt;font-family:Arial;color:black'><o:p>&nbsp;</o:p></spa=  
n></font></p>

<div class=3DMsoNormal align=3Dcenter style=3D'margin-top:7.5pt;text-align:c=  
enter'><font size=3D2 color=3Dblack face=3DArial><span style=3D'font-size:l=  
0.0pt;font-family:Arial; color:black'>

<hr size=3D2 width=3D"100%" align=3Dcenter>

</span></font></div>

<p class=3DMsoNormal style=3D'margin-top:7.5pt'><font size=3D2 color=3Dblack=  
face=3DArial><span style=3D'font-size:10.0pt;font-family:Arial;color:black=  
'><a href=3D"http://pr.atwola.com/promoclk/100126575x1219491521x1201306563/=  
aol?redir=3Dhttp:%2F%2Fad.doubleclick.net%2Fclk%3B214102108%3B35952091%3Bs">=  
Big  
savings on Dell XPS Laptops and Desktops!</a></span></font> <o:p></o:p></p>

</div>

</div>

<BR>

<BR>

\_\_\_\_\_ Informazione NOD32 4045 (20090430) \_\_\_\_\_<BR>

<BR>

Questo messaggio 20=E8 stato controllato dal Sistema Antivirus NOD32<BR>

<A HREF=3D"http://www.nod32.it">http://www.nod32.it</A><BR>

</body>

</html>

-----=\_NextPart\_000\_0428\_01C9CC96.3758D8A0--

**A Great Credit Score is 750 or Higher. See Your 3 CREDIT SCORES FREE - Online!**

**FTC PXA:9**



**From:** kevintrudeau@aol.com  
**Sent:** Monday, December 10, 2012 6:41 AM  
**To:** Neilsant@miint.net; jeff.devine@websitesolutionsus.com  
**Subject:**  
**Attach:** Royalty\_Agreement\_bank\_details\_Future\_TX\_co.docx

---

need my speaking fees to be current NOW. I will not speak sat unless I am curent,  
Many thanks  
Kevin Trudeau

Royalty Agreement bank details:

Company agreement is with:

Future Transactions Company Ltd (Registered in the UK Company # 07937551)  
Suite 2 Causey Hall  
Dispensary Walk,  
Halifax,  
West Yorkshire  
HX11QR  
UK

Banking Details

Bank: HSBC  
Branch: HSBC, 7 Commercial Street, Halifax, West Yorkshire, HX1, 1HN, United Kingdom

Account Name: Future Transactions Company

Account Number: [REDACTED]

Sort Code: [REDACTED]

IBAN – [REDACTED]

SWIFT – [REDACTED]

**FTC PXA:10**

  
[Advanced Search](#)

[SIGN UP](#) [LOG IN](#)

# FUTURE TRANSACTIONS COMPANY LIMITED

Registered Address: Suite 2 Causey Hall, Dispensary Walk, Halifax, West Yorkshire, HX1 1QR

[WATCH THIS COMPANY](#)

[ADD TO DASHBOARD](#)

**COMPANY  
RISK REPORT**

[BUY NOW](#)

SHARE

Credit Status:

Company Status:

Owner Verified: Not verified by director

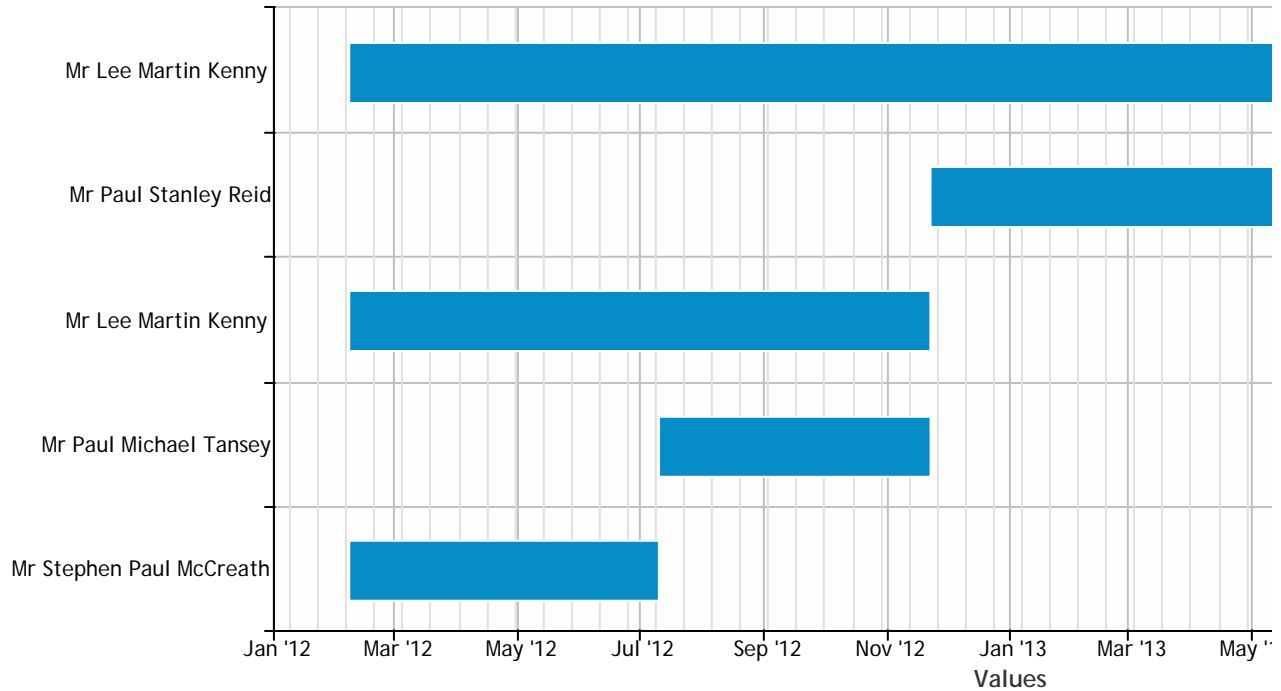
- Summ
- Accou
- Credit
- Risk
- Direct
- Struct
- Docum
- Feedb




 [Advanced Search](#)

[SIGN UP](#) [LOG IN](#)

### Company Directors



### Current directors and secretaries

Current Officer Name	Appointed	Current	Historical	Total	
<a href="#">Mr Lee Martin Kenny</a>	06-02-2012	6	3	9	<a href="#">BUY NOW</a>
Current Secretary Name	Appointed	Current	Historical	Total	
<a href="#">Mr Paul Stanley Reid</a>	21-11-2012	1	0	1	<a href="#">BUY NOW</a>

Previous directors and secretaries


 [Advanced Search](#)

Previous Director Name    Appointed    Resigned    Current    Historical    **SIGN UP**    LOG IN

<a href="#">Mr Stephen Paul McCreath</a>	06-02-2012	09-07-2012	15	9	24	<b>BUY NOW</b>
--	------------	------------	----	---	----	----------------

Previous Secretary Name    Appointed    Resigned    Current    Historical    Total

<a href="#">Mr Lee Martin Kenny</a>	06-02-2012	21-11-2012	0	1	1	<b>BUY NOW</b>
-------------------------------------	------------	------------	---	---	---	----------------

<a href="#">Mr Paul Michael Tansey</a>	09-07-2012	21-11-2012	0	1	1	<b>BUY NOW</b>
--	------------	------------	---	---	---	----------------

## No. of Employees

This business has not provided employee information.



### Company Officers

Current directors and company secretary details are extracted from the latest Annual Return filed at Companies House, along with any amendments filed since the Return, including terminations, appointments,

changes in share holdings and share capital. View the [Filing History](#) for



FUTURE TRANSACTIONS COMPANY LIMITED to review details of latest changes.

[Advanced Search](#)

[SIGN UP](#)

[LOG IN](#)

## Employees

The total number of employess within a company are shown for each year where they have been provided. Only large full filing companies are required to file employee figures.

---

Need a little help? Try our list of [FAQs](#) or [contact us](#).  
If you're a Pro customer, [login](#) to your dashboard and use the help section for VIP priority support.

HOME

SIGN UP

CONTACT US

ABOUT US

OUR API

ADVERTISE

HELP & FAQ

SEARCH

SEARCH HISTORY

TERMS AND CONDITIONS

LISTING POLICY

COOKIE POLICY

© COMPANY CHECK LTD 2013

3-5 College Street

Nottingham

NG1 5AQ

FACEBOOK

TWITTER

GOOGLE+

Like 3.5k

2.7k

PXA:10 at 4

Follow @CompanyCheck

 [Advanced Search](#)

SIGN UP

LOG IN





**FTC PXA:11**



4  
H

PAGE 1 OF 1  
BANK OF AMERICA, N.A.  
WIRE TRANSFER ADVICE  
1 FLEET WAY PA6-580-04-05  
SCRANTON, PA 18507

WX 0000 089 020512 #001 AT 0.384  
THE LAW OFFICES OF MARC J LANE  
A PROFESSIONAL CORPORATION  
OPERATING ACCOUNT  
180 N LA SALLE ST STE 2100  
CHICAGO IL 60601-2701

DATE: 02/14/13  
DIRECT INQUIRIES TO:  
800.729.9473 OPTION 2  
ACCOUNT: [REDACTED]

THE FOLLOWING WIRE WAS CREDITED TODAY:

USD AMOUNT \$14,975.00 .

TRANSACTION REF: [REDACTED]  
SENDER'S REF: [REDACTED]  
ORIGINATOR: FUTURE TRANSACTIONS COMPANY LIMITED  
ORIGINATOR'S BANK: HSBC BANK PLC  
SENDING BANK: HSBC BANK USA, NA  
BENEFICIARY: THE LAW OFFICES OF MARC J LANE ID: [REDACTED]  
PAYMENT DETAIL: FOR FURTHER CREDIT TO CHECKING ACCOUNT [REDACTED] INVOICE 24726



PXA:11 at 8

PXA:11

FTCX 12-EE  
PXA:11 at 8

**FTC PXA:12**

September 18, 2013

Lee Kenny  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Lee Kenny:

I am writing you to earnestly request that you help me fulfill my obligations under orders dated August 7, 2013 and September 18, 2013 entered by Judge Robert W. Gettleman in the United States District Court for the Northern District of Illinois. To that end, I ask and direct you to provide full and immediate cooperation with Robb Evans & Associates LLC, their counsel, and any of their agents by providing them any information or documents that they request as fast as possible. In particular, and without limitation, please provide them details of any transfer to me, the location of any of my bank accounts, and the location of any of my other assets. The Receiver will also ask detailed information and documentation regarding the Future Transaction Company, including ownership, control, and disbursements to individuals.

Sincerely,

  
Kevin Trudeau

**FTC PXA:13**



Toll Free: 800-891-2341

Local: 310-593-2200

Fax: 310-393-4230

### INVOICE

Invoice ID: 102

Invoice Date: 10/10/2008

Account ID: KT930

Paid On: 10/15/2008

Shipped On: 10/17/2008

*1 of 2*

**Account Representative(s):**

1. Roger Heman

**Shipping Address:**

Natalie Babenko

██████████ Deloro Dr.

, CA ██████████

Date	Description	Quantity	Price	PriceExt.
	\$20 St. Gaudens MS 65	50	\$2,200.00	\$110,000.00

**SubTotal:** \$110,000.00

**Tax:** \$0.00

**Shipping:** \$43.00

**Grand Total:** \$110,043.00

**Comments:**

**FTC PXA:14**

00778  
Office AU #

11-24  
1210(8)

Purchaser:  
Purchaser Account:  
Operator I.D.:

PATRICK E LEE  
[Redacted]

PAY TO THE ORDER OF

\*\*\*ROSALAND CAPITAL\*\*\*

CASHIER'S CHECK

*[Handwritten Signature]*

SERIAL #:  
ACCOUNT#:



October 14, 2008

\*\*\*One hundred ten thousand fifty dollars and no cents\*\*\*

\*\*\*\$110,050.00\*\*\*

WELLS FARGO BANK, N.A.  
202 E MATILIA ST  
OJAI, CA 93023  
FOR INQUIRIES CALL (480) 394-3122

NOTICE TO PURCHASER - IF THIS INSTRUMENT IS LOST,  
STOLEN OR DESTROYED, YOU MAY REQUEST CANCELLATION  
AND REISSUANCE. AS A CONDITION TO CANCELLATION AND  
REISSUANCE, WELLS FARGO BANK MAY IMPOSE A FEE AND  
REQUIRE AN INDEMNITY AGREEMENT AND BOND.

VOID IF OVER US \$ 110,050.00  
**NON-NEGOTIABLE**

Purchaser Copy



**FTC PXA:15**



Logged in as: Paul Reid of Global Information Network

You last logged in on: 6th September 2013 at

Fdn

16:55

**Broadcast:**

You have received new urgent message(s). Select **Read Urgent Messages** to view these.

NB: The current page and any data selected/input will not be affected when viewing the message.

## Payment debit advice

Name:	GLOBAL INFORMATION NETWORK FDN UNIT 1, CAUSEY HALL	Our ref:	EBANKGO52445657
Address:	DISPENSARY WALK HALIFAX HX1 1QR	Your ref:	NAT - GIN COMM
		Date:	20th August 2013
		Time:	10:34:21
		Delivery Ref:	00168981962

**We confirm having remitted the following Urgent transfer**

Amount debited:	USD 16,345.02	Date payment to leave:	20th August 2013
From account:	██████	Beneficiary bank:	GLOBAL BANK OF COMMERCE ST JOHN'S ANTIGUA
Amount sent:	USD 16,305.79		
In favour of:	NATALIYA BABENKO	Payee bank:	BANK OF AMERICA, N.A.
Beneficiary account number:	██████	Ordered by:	GLOBAL INFORMATION NETWORK FDN
Payment details:	GIN COMMISSION FUNDS FOR FINAL CREDIT TO ACCOUNT CK- - NATALIYA BABENKO		

**Transactional information**

Requested amount:	USD 16,305.79
Exchange rate:	
Deal reference:	
NWB commission charges:	USD 25.62
NWB commission charges information:	
Agent Bank charges amount:	USD 13.61

**FTC**  
**EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

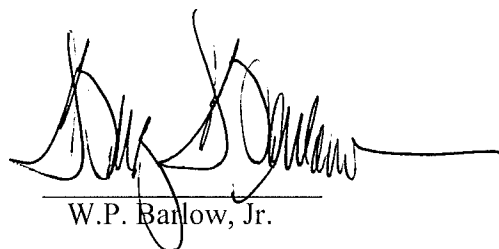
_____	)	
FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 03-C-3904
	)	
v.	)	Hon. Robert W. Gettleman
	)	
KEVIN TRUDEAU,	)	
	)	
Defendant.	)	
_____	)	

**DECLARATION OF W.P. BARLOW, JR.**

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

(1) I am a retired member of the Texas bar and a consultant. In late 2012, Kevin Trudeau (“Trudeau”) engaged me to work on his behalf, and specifically to encourage the FTC to resolve or abandon its litigation against him.

(2) I communicated primarily with Neil Sant (“Sant”) regarding my progress. When Sant stepped down as Trudeau’s representative, Lee Kenny replaced him as the person to whom I reported the status of my efforts on Trudeau’s behalf.



W.P. Barlow, Jr.

Executed on October 11, 2013 in Dallas, Texas.

**FTC**  
**EXHIBIT C**


**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

_____	)	
FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	Case No. 03-C-3904
	)	
v.	)	Hon. Robert W. Gettleman
	)	
KEVIN TRUDEAU,	)	
	)	
Defendant.	)	
_____	)	

**DECLARATION OF JAMIE MARSH**

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the following is true and correct:

- (1) I am a compliance officer at Rosland Capital.
- (2) Our invoices contain “Account ID” numbers. The account ID number generally consists of the customer’s initials followed by the first three digits of the customer’s zip code.

  
\_\_\_\_\_  
Jamie Marsh

Executed on October 17, 2013 in Santa Monica, California.