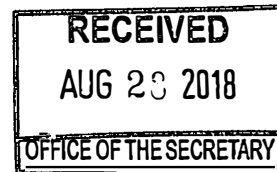


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Brief for vacate order

Edward M Daspin

██████████ Boomton.n.J ██████████

██████████ @optonline.net ██████████

case 3-16509

Brief in support of motion to vacate complaint; TRO for a Commission order to dissolve Judge Grimes judgement & fines, request for legal fees, request for Payment of \$2,800,000.00 compensatory damages' Attributable to a willful abuse of defendants' time spent to defend A complaint In front of a Adm. Judge ,who violated the constitution And was not empowered to rule; if the commission does not vacate the Complaint for good cause showing , a request for it to pay defendant the one[1] million to Hear the case knowing he was an inferior officer and that any judgement he rendered would set aside & that Defendant already paid ;due to the Commissions' error by assigning a junior officer hear, one not constitutionally appointed ,to hear after a New York federal Judge brought to Judge Grimes attention, in another matter prior to his hearing my case, that he should obtain the Commission's appointment under the article 2 of the appointments clause, to be empowered to rule. Or ; in alternative a 4 year consulting contract to be defendant to be an S.E.C ombudsmen to advise Commissioners ,were applicable to settle, vacate or not try a case for lack of facts to support the proposed action[s].

Dear Mr. Fields;

1]This brief is supported by a declaration by Edward M Daspin, sworn to under penalty of perjury as to the correctness of the statements declared therein and which by reference I include herein. In addition, it and I rely on the United States supreme courts decision in Lucia vs S.E.C.138 sct.2044 no.17-130 June21,2018 and include herin by reference it and all other submissions I filed with this Commission.

2]The aforementioned documents I offer as proof that the complaint I wish the commissioners' to vacate has no facts pled to support the OIP, other than evidence that proves my innocence rather than guilt and based on the Lucia decision; I hold the Commission responsible for the actions of its inferior officers wanton disregard of my information to him that he is not authorized to old hearings and make decisions of fact as he is a violator of the article 2 of the constitutions appointment clause.

3]the United States government has the singular right to right any wrong doing tht it commits in the course of protecting its citizens and carrying out the law; especially if such acts have caused irreparable harm to persons, who absent the erors of government agency's, would not be so damaged.my reputation and that of my wife were disparaged by this commission bringing on a complaint which theyknew andor should have own had no basis in fact for the allegation s' .This Commission has a

responsibility to its citizens' to impose financial penalties on tort feasons' that violated the law and constitution and to reimburse any defendant it harmed by violating our laws and or constitutional amendments which were willfully violated knowing the consequences to citizens of our great country wee being trampled on before such violations were initiated by An adjls actions ,the chief judge and or by its prosecutors, all of which wrong doings occurred in my case as related in my declaration of even date and in prior submissions to the Commission.!!

5]I note for the record that I have a felony stemming from an action i took to provide 50 of my transportation corporation's truck drivers' they needed to distribute the publics products. My corporate attorney and good friend Mr. Roy Cohen[may he rest in peace]; who represented me and was a junior partner of some of the more than 100 corporations' we owned in the 1970 S" including a silent partner in the trucking companies had recommended that we keep the trucks and have the drivers hide them to keep their jobs during the holiday season.my corporations had been double billed for the dsame trucks being leased to us and since the drivers and their respective familys' lived paycheck to paycheck we and he found it morally right to commandeer the trucks away from a receiver until the ill begotten gins from the transportation companies' until they were paid back for the double billing feigning that 50 vehicles were leased when it was only 25.There were no computers in those days and having over 1500peices of distribution equipment was almost impossible to track. However when my brother in law became a terminal manager he saw the monthly billing and counter the drivers on payroll and then it did not take a scientist to see what was draining one of the branches used by the 6 subsidiary's we had acquired to know there were more trucks' leased than we had drivers at the terminal.

6]I REFER TO MY ATTACHED DCLARATION WHEN COMPARED TO SOME OF THE OIP ALLEGATIONS ADS CONTINED IN THE COMPLAINT ND WHICH CONTRAVENES EACH AND EVERY DISENGENUOUS AND SORDID ALLEGATIONS FALSLY ACCUSING ME OF MILKING WMMAWHEN THE FINACIAL SUBMISSIONS PROVE THAT IT WAS MY RESPONSIBILITY TO SUCTURE WMMA DEBT INCURRED TO MY CONSULTING CORPORSTION CBI And SUBSEQUENTLY MKMA subordinated or forgive WMMA of over \$3,000,000.00 of working capital while only collecting \$ 240,000.00in excess of repayment of my wife's loans to WMMAH down streamed to WMMA, startup capital repayments and T and E funded by my credit card which WMMA was contractually obligated to reimburse to MKMA: SEE WMMA/CBi/MKMA service contract of 1/20/2011.The \$3million in debt consisted of approximately a combination of \$850,000.00 in fully subordinate notes ,which were not to be paid until the employees salarys ' were paid and which were also deferred until profits projected permitted them and MKMA[10% of any profits] to be paid and if profits' never were made and or the company broke even no interest accrued no was the principal to be paid! .In addition; CBI my company, forgave \$1million of the IMC fee it was contractually empowered to receive from WMMA.

7] No one looking at these concessions' which were voluntarily given by me, with a brain could allege and/ or believe I would dare Milk the very company I offered capital to in excess of 12 times the amount paid on account by WMMA.A reasonable logical man and or Commission would take exception for me based on the giving and not taking. The commission is over worked in my opinion and it needs the services of a street smart consultant, that signs' a confidentiality agreement and areas to be bound and on abest faith effort will work mostly from home as i have an ill wife to attend to to reveiw20% of the cases which have finished the wells submissions but not yet resulted ina complaint being issued .I would also head up another 5persons'[after a test run f the amount of manpower required. better to let 100defendats escape prosecution that to prosecute one innocent man. Regardless of the Commissions

mandate for no due process, no jury and no brady the defendants' deserve a fair shake!!; and not like the fiasco that happened with me wherein the facts contravene the complaints' allegations all over the place.

8]I believe the Commission is too over worked; I believe, based upon a glaring error of initiating a lawsuit when the defendants' pleadings', if followed up prior to initiation of the complaint,' would call for A No Bill. The job should be done by an independent consultant not under the power of the Commission so that its findings would not be biased as many are due to this commissions power and because the Commission has first right on appeal. In that regard I believe that the same inferior officer allegation would hold over regardless of the Supreme courts current stand. Thank GoD for that court as without them all would be lost an they will et to it when they have an issue before them im sure. I am asking to be compensated for the loss of my productivity for 4years,being assigned to an inferior officer when the Commission knew of the defect, when the facts proved a no bill should have occur PRIOR TO INITIATION OF A COMPLAINT,WHEN THE Judge who was cautioned to obtain the Commission's appointment before proceeding on his merry way.

8] That federal district court informed Judge Grimes before my case was assigned o him and instead of following the recommendation he chose to ignore it providing cause to my plea as his obstinate position called for me to waste my time, be diverted from making money and caring for my wife of 55yers.Youhave no idea of the damage a false complaint incurs in innocent defendants. I never lost out of 50 cases one lawsuit as a defendant and I must tell you the entire proceeding smelled like a fix, was a fix independent of the Commission and emanated for the regions head of enforcement carried on by Mr McGrath, propagated by Mr. Nicholas Kolodny and Barry o Connell .being assigned to my case and on another case in federal court in New York wherein adjl His Honor James Gimes was called to task for appearing without the article 2 appointments clause and attributable to no ombudsmen at the juncture just before a GO OR NO GO FOR A COMPLAINT IS CALLED FOR. You don't have to be a lawyer to make a recommendations.

9]MY CREDENTIALSI have' been practicing Pro See for over 50 years ,im recognized as expert appraiser and dealmaker with about 300 acquisitions and or strt up under my belt, im acquainted by the laws in securities specialty work and as a result of operating many of the 300 entity's' I either directly and or indirectly owned and or consulted for and I can assess the nexus of the issues and focus on the defendants' points first to offset the due process proclivity to find guilt. I know how to read briefs and ask questions if the defense is willing to talk of its own accord to assist its clients to eliminate the potential for an action being commenced against him/her and or the entity they are associated with becoming a defendant that is pled as innocent and the facts support the initiation of one or do not. Indeed; The SEC could recommend that the potential defend ask for a hearing and pay the court to have the study performed within 2 weeks' and with the enforcement division having the right ,prior to its publication of a no bill to counter the opinion prior to is issuance. Then the consultant and a committee of 3of the 5 would make a decision that it agree's with either party for and inconsideration of its findings. and a recommendation would be forthcoming with the potential defendant waiving any right to see the report unless it asked the Commission for a no bill, without the commission obligated to accept such recommendation.

10]My representation would be undertaken to examine the facts pled, the issues raised and then based upon my opinion this commission would decide; Ya or Nay and that would be that . In the alternative I

request compensatory damages equal to the WMMA deferred hours not paid for as I've spent approximately that amount of time [4 years] on this case as at WMMA and I request \$2.8 million dollars compensatory damages or a contract for 4 years at that hourly rate either by the commission or the executive branch. One brought by gross negligence and disregard for defendants' submissions and subpoenaed documents that contravene the facts complained about. My compensation for the last 10 years is \$350.00 an hour about 70% reduction from what the Adjls and enforcement seem to be paying to the consultants they called. We would of course like a bonus for every potential defend the enforcement division request for a lawsuit to be initiated. I am entitled to 4 years diversion and efforts to clear my blame. I have been maligned by your inferior officer, not qualified to rule and or hear, the prosecutors in my case have been charged by me of prosecutorial misconduct as demonstrated by Mr Mc. Grath and Mr' Nwuguvu and described in the attached declaration of even date. At \$350.00 an hour every month bills out \$70,000.00 and each year is \$700,000.00. Four years comes out to \$2,8 million. I will forgive that cost during my productive years, the effect of stress on my wife, which in part came from the false complaints allegations against me. Her mind could not accept those published allegations of the Grimes court all of which were soundly defeated by the Supreme court in Lucia.

11] My name has been damaged by the courts misplaced findings that I acted out suicide rather than having the side effects from the Pfizer medicines [Neurontin/Lyrica that I took together and which side effects of suicide fall on the heads of one out of every 500 victims' Google disclosed that over \$2.5 billion in lawsuit claims from the annual \$250 Billion in sales plagues our country; yet the enforcement division hired a psychiatrist to psychoanalyze me and my doctor Alan Puzino whom, he never met either of us, and his analysis was accepted rather than the 5 fact witness declarations and/ or the Admissions record of the causal factors. Then this violator maligned on the internet the findings he was not authorized to make which disparaged my persona and many persons that I know asked me how long I acted insane?? I did not act, but his alleged disinterested opinion, we know was biased as I recently wrote brief on that issue submitted to this commission. That inferior officers' conduct and action this commission is responsible for and that will in part be cured if this commission hires myself and the 5 additional persons that will offer insight to keep this commissions record spotless. I ask the commission to ask the President, if in doubt, to see if he believes the expense will offset the perceptions about in house being a place wherein there is no ombudsmen to view and potentially offset the proposed enforcement divisions' recommendation. The Decision will of course make the final call over a very short time frame [30 days] if requested by prospective defendants prior to initiation and after all Wells submissions. Knowing the rates of Law firms and consultants' there is no similar rate for the reporting function so that a delay of 30 days is well worth the wait as only a guilt prosecution request, and if the defendant requests the resolution, that will be initiated by myself CBI And MKMA.

12] The court also was in contempt of the 2nd circuits' stay order in favor of Mr. Agostini [Please review the declaration by me in support of the relief requested. and collaborated with Mr. McGrath's subornation of Prejury of Mr. Agostini to double team Mr. Agostini and coerce him as well as suborn his testimony as the attached declaration indicates'. The judicial Bias and prosecutor misconduct together with the filing of a disingenuous complaint contravened by the facts as elucidated in My Declaration and submissions filed before this commission are and were untrue at its core! that conduct demands compensatory damages be paid me. I will forgive the claim if I and my corporation Consultants for Business and Industry and MKMA both receive the assignment as it is my mission to serve this commission and the administration, reduce the initiation of complaints against defendant that the

information and interviews point to a NO Bill, with the Commission in full charge of course. Myself and a 5 man/woman staff which I will select that have my background will enable this commission to have a solid backstop, save embarrassment and give the potential defendants a fair chance¹

13] is my view that such a representation might reduce the case load by as much as 20% of what it is today and pay for itself every year while dramatically reducing the initiation of complaints against innocent people that it was completely fulfilling the review of the 500 cases assigned to the in house proceedings if the enforcement division maintains its superiority of making findings regarding jurisdiction and venue. In addition and the attached declaration requests tis defendant to be paid for legal defense for the one[1]million I asked them to pay under the Eand O policy as the declaration attached requests and only if the request for an order to vacate the complaint is not made¹paid to the Herrick and Feinstein subject to an accounting from them of the insurance claims they made. This is required as i was brought before a violater of article 2; who has been found not able to hear the case for that reason. Its' the Commissions' fault that I was defrauded by it to believe that the he was empowered to hear and find; yet this commission and enforcement knew and /or should have known the undertaking was farcical. The false set of charges in the complaint ,if this commission does not vacate the complaint, requires an attorney and this Commission forced me to pay over the insurance amounts by also putting me and the law firm responsible to be heard by a violator of the appointments clause.and an inferior officer of the Commission making it fully responsible to the damages tio ,y repittion that I would not have incurred had the commission done the right thing and made the appointments required under the Constitution. It was no a mistake as a federal district court judge in 2014 instructed the grimes court to find an appointment benefit to clear his ability to judge . Instead he hid the rebuke and continued on his merry way as discussed in the declaration I signed and attached to this breif. A word to the wise should be adequate as if not released it will come back to bit you unfortunately. I want the Trump administration to listen to a higher calling, one for justice, one for empathy, one for eliminating the disparaging remarks that I endured from this man who we call a Judge, Judge James Grimes .I know our President wants to clean up this agency to go after real crooks, not make believe crooks indicted because they made a mistake 45years AGO; BUT now.

14]I have declared he is incapable of not being biased against defendant's, he is incapable of providing justice as my case demonstrates and he cares little for the damage and destruction his cruel conduct inflicts on those defendants assigned to him. I believe he is a prosecutor in his heart as demonstrated by his actions against me. I do not take it personal but as a learning lesson .A word to the wise is called for. In addition you must retire the old guard in my opinion. Judge Brenda Murray is another fixture that needs replacement. Id recommend Judge Carol Feolak, as In my opinion she was fair, did not permit herself to be coerced by Judge Brenda Murray and called it as she saw it ;thru use of the 7 facto test which federal district courts use to guide a postponement decision. It took guts for her to rule against what we all knew judge Murray would want as evidenced by her removal on trumped up charges! I ask the inspector general as well as the head of all U.S attorneys'; the attorney general to review the commentary being made herein.

15]They, the investors in the WMMA case,in the dishonest shareholders meeting, mentored by [REDACTED]. [REDACTED]; See EX A to the defendants Wells rebuttal; PAGE 17 Section stated in the transcript that they would collude and conspire with bill[Mc farlane] to fabricate I was a controlling person in order to bring me into the venue and jurisdiction of the SEC knowing the falsity of the complaints' allegations.Thankfully on the same page is the admission that the WMMaboard called the

shotsSEEI20-L25.lets give the board all we have so they will fireMKMA and [me] nd its excessive fees. its interesting to note that the truth came out despite their agreement to try to blame me for the conduct of the company when in fact on the same page she and they admit it was the WMMA board having the control and not me!!This was given before any initiation of a complaint and is significant. We must offset the natural proclivity to paint potential defendants as guilty before we have real case. This Commissions' responsible to reimburse me for the damages or let me be a consultant help society ,this administration and perform a much needed band aid to make thing right.The Herrick law firm[MS Carol Goodman] solicited me for a similar spot for their cleints,

16]See Mr LUX, its CEOS' deposition wherein he states that the board of directors declarations were in control of the WMMa/WDI companies ; that I was only consultant; not an officer director ,and/ or shareholder and that I had no power to control nor did I vote on Board resolutions and that he was its CEO and not me! Just as Mr. Agostinis' answers declare by its denial of each and every allegation Under the penalty! .In addition; the complaint allegations are contravened by Mr. Nwugugu ,its Sr vp corporate compliance, as well as an SEC licenses' holder, holding a MBA, CPA and Masters degrees declared in his Chartis Insurance claim of 12/10/12 That "he was the better writer and had the expertise and that he not I, [as the complaint alleges it was me and then goes on to allege that I was responsible for all allegations of wrongdoings, non disclosures of myself in all Companies PPMS] wrote 100% of the WMMA PPMS! Therefore he, not I, as the complaint alleges was No CONTRO person, NO WMMA PPM WRITER, JUST A CONSULTANT! The Jan20,2011Service contract that I signed states my company CBI and is assigns have no power to bind anything for WMMa just as all WMMA employees employment contracts do not have the employees report to me but to Mr. lux and or Main its CEO and President respectfully.

17]It was the enforcement division that perpetrated a fraud against this commission ,one that the commission could have corrected when the read defendants' WELLS submissions' but one that Mr. Kolodny failed to point out to his superiors at enforcement! The example we learn is that the former commission was overloaded. Please don't compound that mistake .I have offered, as a barter against the Commission reimbursing me for the damages I sustained and to assist the commission to become bullet proof and help defendants wrongfully accused as I was. This commission should have caught these marked deficiency's and not initiated the complaint

18 In closing and pursuant to the declaration and the findings of fact in Lucia and which I asked for using the appointments' clause argument before the N.J federal district court and then submitted to the 2nd circuit as mr Agostini had, for the Judgement of an inferior officer to not be accepted as he was not appointed under article 2 and I should have received the same treatment as Mr. Agostini a stay, but that was not to occur at that time. In the meantime mywife require a finding by this Commission to enable her to refinance her home before the affordable home cre act expires at yers end. It takes 90days toobtain and irreparable harm will be incurred by me and her absent an order finding that the judgement as well as the fines are dismissed and of no consequence by order of the commissions adherence to the Supreme courts order.

Please sign those orders attached and acceptable to this Commission. Im' 80 years young with more experience than many lawyers as iv'e prevailed in over 50 civil actions as a defendant, I was an officer and tank commander in the army during the Veitnam war, I was captain and undefeated wrestling Captain u for 2years at New York University on a full wrestling scholarship, I than built and operated a

childrens' camp in 1960 spent 5 years and it's still one of the most successful childrens camps with over 2,000 children and over 200 counselors. It still runs today. I purchased or started up over 300+/_ corporations specializing in leverage buyouts, graduated from a 6 month stint in federal prison for not following an order to return the vehicles that a debtor leasing company had double billed for. Over the years I operated and consulted for corporations and counted among my clients Jay Pritzker [Hyatt Hotels], Leo Housman [United Cerebral Palsy president and Belding Hemingway vice chair], Robert Marick, former Merck Sr VP and Under President BUSH office of management and budget director, My partner Mr Charles Skibo, Sprint's first CEO. was joint venture partner and many other noteworthy persons and presidents of countries I have acquaintance with. I can make a great contribution to our administration. I believe in our president and want to assist in any way I can. The enclosed declaration fully explains the relief requested and I wish this new panel the best luck possible, I want to help, at reduced rates, and not be put in a position to plea for the damages my family sustained as a result of the old regimes bad faith and disingenuously filing a complaint that is contravened in all respects by the facts submitted by my submissions of the exhibits to enforcement prior to a complaint being filed and their knowledge of the falsity of the allegations' they were prepared to recommend the old commissioner accept. Those commissioners obviously did not read and therefore fell victim to the bias expressed by their house model. They are responsible but I'd rather work for my bread and help those harmed by no representation ..

Respectfully,



Edward M Daspin Pro See

certificate of service by Ups on 8/27/18

THE PRESIDENT OF THE UNITED STATES; THE VICE PRESIDENT OF THE UNITED STATES, THE SPEAKER OF THE HOUSE; THE ATTORNEY GENERAL OF THE UNITED STATES, THE INSPECTOR GENERAL OF THE UNITED STATES ALL BY PRIORITY 2 DAYMAIL

3 COPIES FOR Mr. Fields for the Commissioners'

By email to MS. Shields for all attorneys in the SEC, Mr Kolodny, Mc Grath, Barry O'Connell, Mr Agostini, Mr. Shapanka, MR Lux

I swear that I have delivered to UPS the information contained herein, the declaration, the brief, this certificate and the orders for Commissions signatures if acceptable on 8/25/18

Edward m Daspin 

HARD COPY

EDWARD MDASPIN PRO SEE

██████████ BOONTON.N.J. ██████████

CASE3-16509 AT

8/20/18

██████████ ; ██████████ @OPTONLINE.NET

DECLARATION IN SUPPORT OF ORDER TO SHOW CAUSE ; AND MOTION TO VACATE COMPLAINT AS THERE IS NO FACTUAL BASIS FOR THE ALLEGATIONS CONTAINED THEREIN, AS A PREDICATE ACT THIS COMMISSION, TO BE FAIR MUST, REIMBURSE ME THE ONE MILLION I SPENT ON MY DEFENSE AS THE COURT WAS A VIOLATOR OF THE CONSTITUTION'S 2ND AMMENDMENTS' APPOINTMENTS' CLAUSE AND THEREFORE THE COMMISSION AND THE COURT, KNEW OR SHOULD HAVE KNOWN; THAT ANY FINDINGS WOULD BE SET ASIDE BY A MEANINGFUL TRYER OF FACTS ;SEE LUCIA VS SEC, WHICH I RELY ON AND ATTACH HEARWITH BY REFERENCE TO HAVE THIS COMMISSION SIGN THE ENCLOSED ORDER VOIDING THE DEFAULT JUDGEMENT AND PENALTIES. THIS DEFENDANT ASKS' FOR \$2.8 MILLION IN COMPENSATORY DAMAGES AS ALL DIVISIONS OF THESECK NEW THAT THEY WERE PARTICIPATING IN FRAUDULENTLY INDUCING ME TO SPEND MONEY ON MY LEGAL DEFENSE AS WELL AS WASTE THE REMAINING TIME I COULD HAVE SPENT WITH MY WIFE WHO NOW IS PARTIALLY INCOMUNICADO. I MUST BE REIMBURSED TO BE ABLE TO DEFEND UNLESS THE COMMISSION VACATES THE DISENGENUOUS COMPLAINT TO BE ABLE TO DEFEND MYSELF. MY ABILITY TO DEFEND, IF ASSIGNED TO ANOTHER ADJL. OR THE COMMISSION IS REDUCED BY 50% AS I HAVE LOST 7 INDESPENSIBLE MATERIAL WITNESS WHO COULD CONTRAVENE EACH AND EVERY ALLAGATION IN THE COMPLAINT, AND AS A RESULT I HAVE BEEN DENIED BY TIME SPENT ON A PROCEEDING THAT WAS TO BE A SPEEDY TRIAL AND BY WASTING MY INSURERS FUNDING BECAUSE OF A FRAUD PERPETRATED ON ME BY THE COMMISSION WHO KNEW ALL ALONG THAT THE HEARING WAS A FARCE AND THAT THE ADJLS WERE VIOLATORS AND INFERIOR OFFICERS AND THEREFORE DID NOT HAVE THE INDEPENDANT AUTHORITY TO FIND FACTS; THUS CALLING FOR DUPLICITIOUS DEFENSE AFTER WITNESS DEID AND OR HAD ██████████ AND /OR ██████████ ISSUES AS I NOW FIND HAS ██████████ TO PROPERLY DEFEND AND THAT I COULD HAVE MADE IF THE PERSONS DISCUSSED BELOW WERE ALIVE AND OR HAD THEIR MEMORYS INTACKED TO TESTIFY AT A HEARING.

A) Absent reimbursement for the fraud perpetrated against me and wasting my time I request reimbursement of the one million legal fees as this action abused its discretion, used my insurance legal fund and by exploiting it on a phony case is required to reimburse me so I can hire an attorney to serve as my lawyer as intended by the E and O Insurance policy which funds were used on a case that the commission knew was invalid and or should have known as it was derelict of any adjls being constitutionally appointed The Commissioners [prior to this Trump commission] owe me the funds' to obtain counsel since the fraud perpetrated against me, now requires a 2nd defense; and the insurance funds were used for the first defense! [, unless my vacate motion is granted .! In addition judge Grimes is as culpable as the prior commissioners; it is a laughing stock that I stand here proving that the very commissioners' who initiated a disingenuous action facilitated by the prosecution divisions' omission of many material facts', that exculpate me! They are the guilty party as the commission, much to its discredit relies on young prosecutors' allegations in the Wells submission which eliminated the exculpatory information they already had In Brady, the deposition of Mr Lux, WMMA's CEO and director, who contravened the nexus that the division tried to make about my alleged control of WMMA and my being the DE Facto CEO of Wmma. HE DIRECTLY STATED:

DASPIN WAS A CONSULTANT!THE wmma BOARD OF DIRECTORS RESOLUTIONS RAN THE COMPANY!Daspin was not an officer,director,shareholder of WMMA nor did he vote on the board resolutions when asked to attend for insight into an issue raised that he had knowledge about!he stated he could take me or leave me destroying the implied allegation that I had power of persuasion over him as the complaint inferred and he stated he wanted to fire me and MKMA as we are indebted to WMMA;that he could have done my job!

The Brady disclosures also contravene the allegation that none of the investors knew of my felony until just before they signed the subscription agreement as Mr Lange, a Harvard MBA and VP ABC sports under Howard Cosell and Ruene Arledge informed in Brady he looked me up on the Internet and found about my felony and life activities, and the [REDACTED] declared that she was informed along with Mr Bekadezian about my felony at their 2nd interview, 45 days before she signed. The Brady discloses that the SR VP Human Resources informed all investor applicants about the Daspin control of a majority of WMMA shares through a warrant thus destroying the complaint allegation that had the investors known my family had control of the company they would not have invested! In other words the Lynchpin allegations were known by the division to be false before the commission took action. Mr. Nwugugus Chatis Insurance claim of 12/10/2 destroyed the complaints allegations further by his admission in it that he, not I, wrote the WMMAPPMS that the commission did not have the disclosures required under the law and then blamed me for hiding them. Besides that allegation being false the division did not inform the commission of the facts leading to the merry path of suing the man who created the strategic plan of WMMA and whose family, companies and his own efforts forgave a \$1 million fee, invested as loan capital over \$364,000.00 in cash as startup capital with interest paid, who subordinated \$2 million of fees for services rendered WHILE THE ENFORCEMENT DIVISION ATTEMPTED TO CHARACTERIZE THAT I AND MR AGOSTINI BY SIGNING THE CHECKS WAS GUILTY OF MILKING THE VERY COMPANY THAT I DIRECTLY AND INDIRECTLY SUPPLIED WITH OVER \$3 MILLION OF WORKING CAPITAL OR 60% OF THE CASH FLOW! HOW CAN I BE A MAN WHO GENERATES 12 TIMES THE CASH FLOW THAT WAS PAID OUT OVER 26 MONTHS [10% OF \$2.4 MILLION] OR \$240,000.00 AFTER THE WORKING CAPITAL LOANS PRINCIPAL WAS REPID, THAT'S \$10,000.00 A MONTH. IS THAT MILKING??? When over \$3 million of capital consultation fees was invested as sub debt is an equity donation! Subordinated debt against the investors \$2.4 million investments. The allegations against me were just that allegations contravened by the facts and that absence is called a fraud against the very commission that is here to protect our country. In addition it is so disingenuous as to cause the hair on my neck to bristle with anger. The Wmma PPMs risk section continues disclosure of many complaints allegations were not included in the disclosure to investors and proves they were included even though I was not the preparer! The fact that if the IMC database does not work as projected in the financial projections stated that the company would be irreparably harmed if it did not perform as advertised as no website was up and running, a needed predicate act to test the database's accuracy. The PPM stated in the text pages 3/4 that no one should rely on any un-audited financial statements and no one was authorized to accept as true any disclosure not contained in the PPMs. Regardless the complaint goes on to allege I made oral representations not contained in the PPM to the investors detriment and which on its face was disclaimed as was the Oct 31, 2011 Combined compilation of WMMA/Wdis balance sheet footnoted with a good will MKMA appraisal for the IMC databases of \$83 million. The SEC alleged it was a purposely exaggerated appraisal and that 2 investors reviewing the Jan 5, 2012 WMMAPPMS were fraudulently induced to invest.

The Brady Disclosure contravenes the allegation as IMCS owner stated he was offered \$90 million for the database before it was acquired for no money[\$1.00]and the only 2 investors that reviewed the Jan 5, 2012 WMMAS PPM, Mr Lockett and Heisterkamp, filed claims for fraud against WMMA, in July 2012 to Chartis insurance WMMA's E and O and O insurer! The claims do not inform the insurer that they relied on the Oct 31, 2011 compilation [which on its face informs investors "to not to rely on the financial compilation that's, a non GAAP format", and that the fraud perpetrated against them emanated from Ms. Puccios' misrepresentations and Mr. William Mc Farlane, of Scottsdale Arizona whose history demonstrates he paid a million dollar settlement to a major bank for double crossing them as he was their consultant on the sale of an insolvent clothing manufacturer and signed a non compete that he would not become part of any buyer of the company he was to sell. That conflict of interest was then violated by his buying into the company that purchased the manufacturer in a leverage buyout. We can be sure that crook sold the company at a bargain basement price as he was a 30% owner! I call that stealing, breach of fiduciary and he tried to do the same thing while WMMA's president by instigating the investors to join his Newco enterprise and sack the assets of WMMA, the company they invested in and which Newco sought to take over with the investors while all were officers and had a fiduciary duty to WMMA. Just because he promised them a paycheck and common shares greater than what they would own in WMMA. What did enforcement do! They took up the Newco flag, they distracted WMMA's officers [MR Agostini and myself] by instituting a disingenuous lawsuit against me! They interfered in [REDACTED], [REDACTED]. The enforcement division has soiled their commissions reputation. What are you going to do about it. They omitted material facts. But that does not exculpate the commissioners of old as My Wells rebuttal demonstrated EX A, the dishonest June 19, 2012 Dishonest shareholder meetings transcript! Page 17 demonstrates in living color [REDACTED] mentoring the investors to lie about me! 2-12 States in essence: .."Bill [Mc Farlane says we must demonstrate [to the DEC] that Ed [Edward Michael Daspin] controls all small and large at WMMA'

Further down on the same page 20-25 she makes a Freudian slip when in essence she says:

"Let's collude and conspire together and send information to WMMA's board of directors to get rid of MKMA and its excessive fees [and Ed its employee]"

In this manner she was admitting they were an enterprise with collusion and conspiracy called for against me while at the same time proving that it was not in control but WMMA's Board of directors just as Mr LUX deposition explains

So the Commission had the proof before they permitted the complaint to be filed which also proves that the commission members were derelict and did not read the information before them but just assumed that enforcement consisted of honest men with no hidden agenda [the first mistake] as if they wanted to overlook the facts' as when a person hears' felon they automatically, unless a judge whose paid to rule on current facts', decide beforehand of a defendant's guilt! This case is a living example of justice going awry!

I AM A CONSULTANT CHARGING \$350.00 AN HOUR! [APPROXIMATELY 70% LESS THAN ANY FINANCIAL, HUMAN RESOURCES', CONSULTANTS', THE SEC HAS HIRED TO FIND THE TRUTH.] I HAVE ACQUIRED OVER 300 CORPORATIONS IN MY LIFE TIME AND INTERVIEWED AT LEAST 20 CANDIDATES TO SELECT THE OPERATING INVESTORS TO RUN THE COMPANIES, I ACQUIRED FOR MY OWN INTERESTS AND OR

THE CLEINTS.[TOTAL APPROXAMANTLY 10,000 CANDIDATES[from which I recommended about 5 for each company acquired ie; a ceo,coo,cfo,sr vp maketing,vp cto[total of 1,500 persons in my life time to operate companys ' in which I owned a portion of /or was a consultant for the acquisition.].

I HAVE NEVER LOST A LAWSUIT AS A PRO SEE ,ASSISTED BY CORPOATE ATTORNEYS' AS A DEFENDANTS'[50][EXCEPT HERE FROM A PHONEY ADJL],I WOULD LIKE TO MINIMIZE THE FALSE ALLEGATIONS AGAINST DEFENDANTS' AS THE ADLSEYEAR 3013MARCH 31SR AVERAGE DEMONSTRATED THAT THEINHOUSE FOUND UILT 90%IF THE T VS DEFERAL COURTS 635 OF THETIM,THE STANDARD DEVIATIN IS SO LARGE AS TO DICTATE WE ANALYZE WHY THER ARE TIMES MOR UILTY ADKL DEFENDATS AND IT MUST BE LAYED AT THE PREJUDICIAL BASED DOOR PERMITTING THE LAXITY OF :NO DUE PROCESS,NO FULL DISCOVERY AND NO JURY .THE IN HOUSE DEFENDANTS'; THEREFORE REQUIRE AN OMBUDSMEN THAT SPEAKS FOR THOSE THAT THE EVIDENCE DISCLOSES MAY HAVE RECEIVED A RAW DEAL FROM THE START.THE EGOS OF PROSECUTORS GIVEN THE RESPONSIBILITY TO FRY ALL JUICY LOOKING CLEINTS DEMANDS' A BESPEAK CAURION APPROACH. BY BEING THE SECS[OMBUDSMEN, CONFIDENTIAL OF COURSE] SO THAT THE NUMER OF MISTAKES CAUSING GREIF TO DEFENDANTS',AS HERE, IF FALSLY ACCUSED AS HERE, WILL BE MINIMIZED WHILE THOSE PROPERLY ACCUSED WILL SERVE AS EXAMPLES THAT NO ONE SHOULD PLAY WITH THE TIGER Ie;[The United States Government. I believed and still do, that if I contribute value and transfer it to a client while devising a system of compensation that for the most part is subordinate to the interests of the shareholders. WHO ARE OPERATORS AS IN THIS CAS E,I WOULD BE BEYOUND REPROACH!! WAS WRONG AS THE OPERATORS WIL LBITE THE HAND THAT FED THEM AND ONCE COMPENSATION STOPPED THEYUNVESTED REASONS NOT TO COME TO WORK ENMASSE.LITLE DID WE KNOW THEY WEE ALSO PLANNING TO TAKE OVER WMMAS INTELLECTUAL PROPERTY ITS DATABAE AND IT PROMOTERS POTEMNTIAL INVESTORS AS ENTERPRISEMEMBERS.HOW THE ENFORCEMENT DIVISION FELL FOR THIS IS A MYSTERY.I CHALK IT UP TO MC FARLANES FRONT IN NEW JERSY,MS PUCCIO. [REDACTED] WHOM FARLANE POITED TO THE MNEWYORK RGIION AND THEIR GULABILITY ALONG WITH VEIWING ME A JUICY FELON TARGET>

As a former felony know all the balance sheet tricks and P.L tricks, I know how to discern fraud and can spot guilty person from a mile away based solely on his/her actions surrounding the controversy .As an ombudsmen I would write a recap based on submissions; when reasonable doubt exists during the Wells submissions I would interview at their option, defendants attorney[s] and report my findings one way or the other based upon a finding of potential innocence .I would suggest in those cases that the commission call for a settlement; so that time ,money and exposure will be reduced and efficiency will be promoted.This is needed for the approximately 500 lawsuits instituted by enforcement each year. I will only be able to handle 20% each year and so I will wait for the commission to point me in the right direction and or from my own efforts. Id rather work and help the administration and SEC than get paid for damages.

This is a standing offer. the work effort will primarily be conducted from my home, and I will advise if a conflict exists', and eliminate any cases involving such. Street smarts is a key element I bring to the table. I have been found to be an expert in the appraisal of business and its assets by federal and state court judges as i have appraised about 7500 corporstion's over 50 years of leverage buyouts and interviewed at least 30 persons to select the 5 operators[CEO,COO,CFO,CTO,SR VP MARKETING AND ORSALES] FOR THE SHAREHOLDES AND OR DIRECTORS TO MAKE THE FINAL DECSIONS. [for each acquisition once made by signing a purchase option to close in 60 days subject to due diligence]. About 70% of the business I ultimately acquired had cancer contained in the business which my due diligence

found. Then based on the Amount of surgery required the price would fluctuate in proportion. Flexible sellers made a deal possible as no one wants to admit their child is ugly. While only purchasing 5% of seller prospects for my and /or my clients portfolio acquisitions' the diversity of the industries ive appraised and acquired give me insight into each and every company ,to games played to shape up a company for sale or public offering, to perceive an inventory cushion release to make the GPM look greater than it is I reality and to hide that cancer present in various degrees in all such offerors. I never met a seller who did not lie about the company being shaped up for sale and so the securities laws should only be used in extreme cases wherein the degree of cancer exceeds 5% as that slippage might be below the operators radar and usually presents itself when sr executives compensation is high and proportional to the perception of ebitda increase from that industry's' norm. who both formed an enterprise while officers of WMMA to steal WWMMA for a newco Mc Farlane promised the investors he would fund with millions' and he and the investors went on to destroy pieces of WMMA in the course of time ,when the enforcement division diverted my attention away from suing the Enterprise for WMMA.

The enforcement division knew I did not write the PPMS, that the appraisal of IMC database grew with time as the WMMA strategic growth plan caused WMMA to grow its regional promoter network from one to 14 international and national promoters and the enforcement division with malice of fore thought hid the Brady information, the author of the PPMs the fct that the board resolutions and Mr. Lux and Main its president] were responsible for hiring investors' and all other sweat equity applicants' [80% of WMMA's employees invested no money and received warrants for deferring their compensation until pre tax profits were made just as I and MKMA's deferred compensation racked up over \$3million in fee forgiveness and or subordinated debt. At WMMA, 2 directors approval was needed, and the service contract between WMMA and MKMA and myself as signature for MKMA, stated that MKMA had no power to bind WMMA disproving the control allegation just as Mr. Nwugugus' confession to Chartis insurance a swoe to insurance claim disproved that I could be blamed for any omissions and or disclosures that the SEC alleged should not or should be I included in the disclosures as I was not its author, not an officer or director of WMMA and nothing was wrong with the disclosures in the first place as every possibility for able to speak caution disclosure was contained therein. ,So any reader would be hard pressed to invent errors and that's' were the prosecution fraud emanates from. When the document states do not rely on any financial statement unless its audited and the financial statement in the PPM Staes it's a compilation, non gaap and should not be relied upon this division states that investors relied on it! When the PPM states no one should rely on any persons statements' about the company and that the company denies any such reliance on any such alleged disclosure; than the division states I made statements not contained in the PPM which investors relied on my making moot the Divisions allegations' I controlled WMMA. In addition; the decision hide the fact that the employment agreements' of 40 employees 'including the investors' specifically eliminated any employee to report to e and instead to MR LUX and Mr. Main!

x

My name as a lunatic, actor and con man is all over the universe based on a crooked judges 'FINDINGS' OF FACT' THAT IS THE SAME JUDGE THAT TOOK AN SEC APPRAISERS ANALYSIS THAT THE IMC APPRAISEL WAS EXAGGERATED !!WHEN THE COURT AND NOW THIS COMMISSION KNOW THAT IT WAS CONSERVATIVE AND \$7MILLION LESS THANMR WOLK. [now deceased] was offered for it from independent 3party buyer!

Had the United States Supreme court not vacated 150 decisions and called for new trials from new Adjs[Unless the complaint is vacated] I would be a debtor found by the government of the to owe over \$3million! My Wife is not able to refinance her home with that default Judgement hanging over my name so I need a commission order voiding the judgement and fine by order of the US Supreme court of the United States for just cause.!! .Why did I not succumb to the ceorsion,the subornation of perjury Mr Kevin Mc Grath suborned from Mr. Agostini. who want to make a name for themselves at the expense of our country, the commission and the adjls time. The action against me alleging that I participated in a fraud is disingenuous as my filings before this commission prove that the entire complaint should not have been brought and that its filing was caused not just by ovrzealous prosecutors ;but prosecutors that knew when they filed it that it was false! investors' committed a fraud against me and did not disclose omissions of material facts and omission the prove thay caused me harm and left me without the funds to prove my innocence. As this commission knew when they permitted me to be brought before an adjl that he was a violator of the appointments clause ,,yet persisted in forcing me to stand before an imposter !I have been damaged by loss of the\$1millioninsurance fees paid another law firm which renders me sterile to hire another law firm if the complaint is not vacated and I lost 4years of my productive time based on a hearing that had absolutely no just end as the court was a fraud and this commission knew when it forced me to stand before him he was a violator of our article 2constitution wherby I ask for compensatory damages based on my hourly rate of\$350.00 an hour; or im given a consulting contract for 4years as requested hearunder.! and had a phony non constitutionally appointed judge. Who by his fraud ,and as the prior commissioners instigated me to attend his court also perpetrated a fraud against me and made me lose the rest of my wife's ability to have a good time and know it is with me. This result to cap off after 55 years marriage.! The commission abused its discretion, took a chance with my life and put me and her through the ringer and owes the debt as i require the funds to care for Joan. Absent the false hearings id have had time to continue my consultation agreements ,protect my investment and earn a living.The commission in this instance abused its discretion. abuse of discretion and loss of the time I could have been gainfully consulting over the 4years this fiasco was being produced by the division I ask for compensatory damages at my regular hourly rate of \$350.00 an hour. That comes to \$2,8000,000.00

I swear under penalty of perjury under the laws of the United States of America the forgoing and above declaration by me ,Edward M Daspin, is true to the best of my knowledge .I know if I purposely misrepresent that I am subject to punishment.

1]it's a tragic circumstance that I find myself in as my wife is very ill with alz and as such ; I must perform with pleasure, but which takes up all my waking time as her caregiver, cook, bottle washer, food preparer, home cleaner, shopping provider ,laundry cleaner and therefore at 80 and myself very ill. I have no time to properly represent myself if the complaint is not vacated and for good cause . If the commission denys' the requested relief of its vacating the complaint ,which in and of itself is reprehensible as no tone allegation of wrong doing is backed up by facts! Instead its backed up, if you want to call it that, by suborned and perjurious allegations based on the Puccios' collusion and conspiracy with the other Investors ;'See Page 17 In the dishonest Shareholders meeting of 6/10/12; Wherein they all agreed to fabricate that I was the controlling person But the truth came out onPg17,I20-L25 :wherein they admitted by stake that if they all petitioned WMMAs Board the Bord had the power to fire MKMA and me with it! to try to tag me as a controlling person when the facts prove other wise.I also motion that I be reimbursed for the 4years that the prior commissioners use dup my

time when I could have been making a living MyRateis\$350.00and hour ,and straight time comes out to \$700,000.00ayear totaling \$2,8million in compensatory damages .

This is due to the fact that the prior commissioners were not only grossly negligent when the initiated the complaint knowing by our submissions ;if they read the WELLS RESPONSE that the [REDACTED] misrepresented; and was part of an enterprise as defendants produced the Dishonest Shareholders meeting which proved the conspiracy and collusion of the Investors being tutored as to the party line they should all take when interviewed by the SEC!!or other investigative Agency. After we motioned that the Grimes court had biased hands, that Judge Murray played musical chairs and appointed her stooge in order to eliminate my Postponement Sine die' ; after I asked that they stop the witch hunt; instead of investigating their own prosecutors and judges; they tacitly approved of judge Grimes to continue the hearings' knowing that they had aided and abated him to violate the appointments' clause and that they had a duty to care to stop any hearings until they cured the defect .A federal Judge ,in NewYork where Judge Grimes appeared and admitted he did not know the constitution yet ruled against it,was asked Why don't your commissioners validate an appointment?.

Yet the former Commissioners, those appointed under President Obama, were they were stubborn in the face of holding an illegal hearing against me and as Judge Grimes wanted to provide discouragement fees and penalties for my insistance he was aviolater. I ask for the Commissioners to reimburse me for my time. By not providing fair play the prior commission stole the last 4years that my wife and I could have spent together while she knew who we were and while she and I could knowingly experience the rest of life at our age of retirement. Had the SEC ,not in effect closed the WMMA shop by propagation and initiation of a fraudulent complaint whose allegation's were dreamt up by prosecutors' [that need a job and who think its fun to make up a completely fabricated allegations'] used in such a way as only as a Sophist could ; alleging that I milked money from Wmma when it was the \$3 million capital and loans and subordinated debt I gave to WMMA, when they knew I forgave a one million fee for the IMC contract negotiation; and approved for MKMA sub debt which is capital and equity on a balance sheet poving that I believed in WMMA and rather than milk its asset? I replenished them thus contravening the allegation in its entirety.! What person that acts that way could be accused of putting his pecuniary interests ahead of WMMA?No One.thus making the complaints allegations ridiculous on its face. and myself \$2million of preferred shares and sub debt notes from WMMA and in the face of that they initiated a complaint that falsely made it appear I was THE WMMA savior, rather than milking the very company that I funded over half its' working capital to.how could the former commissioners finding such indicia of innocence support such a disingenuous complaint. Only by not reveiwing the submissions before initiating the complaint; only by thinking that enforcement would provide it a case woth while instead of a juciy felon 45years in history who subsequently never committed a wrong doing as in50 cases over as many years I never lost a lawsuit. The reason I learned my lesson!! In fact in the Chamco matter in2013, federal JudgeTheodar Alpert found me innocent of all the allegations made and there were more counts in tht complaint than here..!Judge Grimes and this commission were defrauded by enforcement that also suborned M.r Agostinis. perjurious acknowledgement that he rather than enforcement asked to settle the case.

2]The \$1,000,000.00 that I spent on legal defense would not have been spent had the Commissioners' and the adjls' been forthright, disclosed the constitutional violation that neutered Judge Grimes and wasted the twilight of my old age from Presiding over any hearing, making any finding[s] of facts expressed by The United States Supreme Court In Lucia VS S.E.C ,which by reference I hear in adopt and

include herein as if attached hear to, as the reasons' that the SEC must vacate the Default Judgement and financial penalties so that my slate is clear so that my wife can apply for a refinance of her 5% interest mortgage prior to a default.

3)Also the division's main prosecutor in my case ,Mr. Kevin Mc Grath is guilty of subornation of a witnesses perjury ,as Mr. Agostini , a settled defendant was coerced to settle by the very clear threats in Judge Grimes findings of facts about me and the \$3million in penalty's against me! As the judge informed Mr. Agostini that; after he could legally get control of his hearing and if found guilty of the crimes he found me guilty of and which he alleged I was aided and abated by Mr Agostini as the judge knew he was the only check signer and that therefore he was coercing a witness to abrogate his own right after he denied mr Agostinis' law firms motion for the court to give him and me time to replace it as the insurance had run; and with it Judge Grimes honor integrity and justice flew out the window with his dissolution of my postponement ;knowing if he dissolved it the facts proved id be irreparably harmed. And I was as I was so emotionally distraught that I took to much [REDACTED]

[REDACTED] actions that caused me to be hospitalized. Jude Grimes ,the prosecution and I knew that the Judges findings comment about Mr Agostini would for him to run and settle a case he had and has ABSOLUTLY NOT ONE IOTA OF WRONG DOING !He should be given a clean record and repaid the fines he has made. I know what a 45yrarold felony can do let alone a run in with the SEC. Had the commissioners not relied on the divisions New York feeding frenzy and read the defendants submissions and halted any complaint until they were sure to its initiation, which is the job they accepted, then there would never have been a complaint filed. Had the commissioners not permitted a violator of the constitution to sit in judgement and deprecate and disparage my character knowing every finding he made was illegal; that my reputation would still be in tact. Instead; they just let the complaints provable disingenuous by the facts that enforcement produced and which the defendants exhibits submitted prove false allegations permeated the complaint against me; adversely effected me and my wife.

They let me use up my legal defense team on a phony judge who wasn't made and knew he was a violator of the Constitution and did not care at duping the defendants that came before him!! Judge Murray liked Judge Grimes enough to flip Judge Feolak out of my case and install the Grimes court. The complaint charges Mr. Agostini as the only aider and abettor that had not settled and that wrote and signed the checks and as a result the Judge Grimes comments' were directly aimed at him in contempt of the 2nd circuit courts stay order!.

Then as Iremember, the next day Mr. Mc Grath emailed an offer to Mr. Agostini; a deal he could NOT refuse, to settle which I directly declare. Mr. Agostini called me on that day and informed me he was coerced to accept; as it came on the heels of Judge Grimes threats' ,in his findings against me, wherein he placed the alleged aider and abbetor who is alleged to have participated in "looting WMMAS cash"[Agostini was the only WMMA officer who signed WMMA checks making the Judges prophecy all the more real] .Mr. Agostini at that time and before he settled ,informed me as his codefendant he" was forced, coerced to settle "by the nexus of the 2 events as aforementioned. Mr. Agostini's settlement was fraudulently induced as well; as if he knew that the ADJL was only a paper tiger ,he informed me before he settled; he never would have settled; but looking at a potential penalty from the Imposer; ,He stood to ,lose \$1,5million and he was just starting out in life and could not ever repay it. His admission were made to me as he did not want me to think he was deserting the cause as my co defendant .Mr Agostini must be given back his fine and have his record cleaned. Mr.Mc Grath, also as the lead

Prosecutor, led the Brady team to either be grossly negligent of accurately reporting the Brady disclosures as Mr. Michael Nwugugu recantation and complaints' answers related was fraudulently reported in the Brady. In Mr. Nwugugus' recantation of the allegations' purportedly made by him to the prosecutors his filthy hands', and those of his 2 cohorts, Mr. Nicholas Kolodny and Mr. Barry O'Connell, if they are any wear near this case I will demand that all Brady" evidence' be thrown out and then It will take 15years to receive a fair trial..

4]Now I know how our President, The Honorable Donald j Trump feels by the filthy Mueller witch hunt, He is being beset by disingenuous allegations in the same witch- hunt that has happened here to Me. If the man wanted to fund directly and or thru his attorney his own election financing that is his right. if another person handling his corporate finances chose to make the payments that he did not know ;so what!. He is allowed to use hi own money and as much as he wants. Its legal to back yourself!

5]Without his power, personality and negotiating abilities this country would be finished as a major power and our grandchildren would have to pay with enslavement to the Russian oligararcs, Putin and/ or Chinas' attempt to dominate. Our President is beset on by Prostitutes who charged him for their services and know want to shake him down. His own counsel , who is bound by confidentiality and fiduciary. Mr. Meullar has no right to aid and abet him[Cohen] to breach his duty to care and to conspire to obtain, by coercion and subornation ,as Mr. Mc Grath has done here; false testimony about the greatest President of the United States ever had. Any evidence obtain thru violating a mans' confidentail attorneys information; should be thrown out as it emanates from unclean hands and is therefore not suitable to be propagated and or used in any manner, if true ,and since it's a fabrication used by Cohen to save his own skin by his making false allegation's about his client it has no place in the annuls of history .Cohens declarations represent a risk to our national security and as such the President is authorized to take any actions he deems necessary to eliminate such security risks.IN My opinion, the President and Rudi Guiliani , who I know personally; must stop this witch hunt fire Mueller !! asked President Trump to do that as its harming our nations security to all of our detriment. Here we finally get a great guy in the WHITE HOUSE AND THIS B.S IS INTERFERING WITH HIS CLEANING UP AMERICA. Just as I ask this commission to rid itself of Mr. Mc Grath , Kolodny and O'Connell. AND THE HEAD OF THE NEW YORK SEC DIVISION WHO WAS BEHIND THIS CONSPIRACY AND KNOWS WHO ELSE WAS. I ask the President to usehis powers to rid me of this damacles sword for no compensation as a former president and his wife standing by promised me a pardon for a \$1000,000.00library ift!.Thie president doesn't need money and that's why he will clean up America as he is clean,Whats a little sex got todo with his great job;he has a right to permit his lawyer to use his own money for the election funding, its his lawyer. if his lawyer recommended that instead of him making the payment his lawyer would make it using his funds its fair and not an illegal contribution!!. What the for er commission did to me is reminiscent of what meuller is trying to do to our president through him out and make restitution for taking 4years of my life knowing that the entire hearing would and or should be set aside. Im entitled to it independent of the damage to my reputation this Grimes fellow committed against me!

5] TIME IS OF THE ESSENCE AS ABSENT THIS RELEIF DEFENDANT WILL BE IRREPERABLEY HARMED IN THAT IN ORDER TO OBTAIN THE MORTGAGEBENIFITS OF THEHOME OWNERS MODIFICATION ACT WHICH EXPIRES THIS YEAR MY WIFE REQUIRES THAT I HAVE A CLEAN RECORD AS IN NEWJERSEY ITS REQUIRED THAT A SPOUSE THAT HAS NO INTEREST IN THE HOME BE A CO-SIGNATURE ON THEMORTGAGE APLICATION!THAT MEANS THAT I MUST INFORM THE BANK ABOUT THIS SEC NONSENCE ;A TRUMPED UP CASE FROM THE START..WHITH THIS MATTER LOOMING OVER US THAT IS

IMPOSSIBLE TO OBTAIN UNLESS AN ORDER VOIDING THE JUDGEMENT AND FINES IS SIGNED BY THIS COMMISSION AND WILL TAKE 3 MONTHS TO OBTAIN JUST BEATING THE CLOCK BEFORE YEAR END. I AM 80 YEARS OLD, HAVE NO ASSETS WORTH MENTIONING AS MY WIFE'S TRUST AND FAMILY LIMITED PARTNERSHIPS WERE FILED OVER 30 YEARS AGO FOR HER ASSETS PROTECTION AND FOR OUR CHILDREN. MY WIFE IS THE GENERAL PARTNER AND UPON HER DEATH OUR DAUGHTER IS THE NEXT IN LINE. AND ESSENTIALLY RETIRED. SO THAT IT WOULD BE A WASTE OF THE GOVERNMENT TIME AND RESOURCES TO CONTINUE ANY ACTION AGAINST ME FROM A FINANCIAL POINT OF VIEW.

The division knew this when they spent over \$1.5 million on a no asset case. Judge Gambredella was not stupid enough to spend a minute of her time on WMMA and Mc Grath knew that as well! Yet he and they kept wasting our country's money and gave Mr Lux, a defendant that did nothing wrong a free ride, no fine, Mr Agostini more honest than Mc Grath will ever be they charge \$25,000.00 frightening him to settle when he suffered every day of the SEC wrongful lawsuit and I'm the last man standing. I ask for \$2.8 million in compensatory damages! There was a fake hearing, a fake action, fake allegations and a fake judge which wasted my legal defense fund and cost me \$2.8 million of my workable hours that this disingenuous case caused. Not one meritorious allegation! Please do the right thing here!!

6] All the above reasons the relief I seek should be accepted and the book closed as WMMA was a start up, its disclosures were admittedly written by Mr. Nwugugu as stated in His Chartis Insurance claim of 12/10/12; Mr. Lux's deposition admits 'as WMMAS' Director and CEO that I was neither an officer, shareholder, employee director of WMMA and that he, not I was its operating CEO he admitted that I was only a consultant and that contrary to the SEC alleging that he was somehow obligated to me as 8 years prior for 4 months we participated in an acquisition and then the SEC omitted that during the 8 years interval I never spoke to him, went out with him and or knew of his existence. ditto the other controlling directors] Between the 2 of them they were the majority disinterested directors and ran WMMA. I had no power over them and there is not one hint, other than subornation of the investors who colluded and conspired to make a false representation that I ran anyone. As I did not, and not one employee contract out of 40, had anyone report to me!! Mr Main, my chiropractor for 3 months who jointly formed Wmma holdings and with LUX operated the company.; that WMMAS Board resolutions operated WMMA, not I as alleged, that Nwugugu not I did the bulk of the documents, not I, as alleged and which Mr. Nwugugu accepts full responsibility for in His Chartis insurance claim, and not I as alleged; That one of the documents he admits he prepared on his own was the very fee and commission

7] The Proof to my declaration is easy: call in that lying fabricator who suborned Mr Agostini's Perjury and stop him from double talk and ask him if I'm lying While You're doing it take lie detector test and I'll take one after he flunks as he is the criminal not me! At least that way I'll have an even chance!! INNOCENT AND FOR 5 YEARS YOUR PREDECESSORS HEAR THE FACTS AND DISREGARDED THEM DO YOU KNOW THE STRAIN THAT PUT ON ME AND JOAN Its your Brethren responsible for her condition and MEULLER RESPONSIBLE FOR OUR GREAT PRESIDENTIAL INABILITY TO FINISH IN THE TIME HE WANTS TO HIS MISSION TO PROTECT US WITHIN AND WITHOUT. agreement which the division blames me for collaborating to cover up investment banking fees as if H/R fees, knowing that on a FIFO basis I never received one dime for those services in any event no matter what they are characterized as;. The Contracts' binding WMMA/MKMA were consummated based on a majority of disinterested directors vote[s] and they were disinterested directors. both Mr. LUX and Main were and re disinterested Directors' vote and so WMMA was legally binding to compensate MKMA for services in accordance with the Fee commission agreement signed by WMMA/MKMA and CBI on Jan 20, 2011. Mr Nwugugu's

recantation submissions prove I had no hand in the drafting of the service contract which the SEC disingenuously alleges was a disguised investment banking fee and then try to time to receiving that fee without a securities license to do so! [One stretch into another stretch into another stretch all of which never occurred ; not one bit of factual evidence supports those allegations' .If a wrong was committed it was Nwugugus' admitted wrong ,He couldn't collude with me as he admits and takes credit in his CHARTISCLAIM FOR THE PREPARTIONOF THOSE AREEMENTS.THATS WHY HE ASKEDCHARTIS FOR \$600,000.00!.In fact a fifo Financial presentation proves I received neither fee as for the first 6 months of 2011 the MKMA hourly fees totaled \$420,000.00 and after deducting loans and authorized expense reimbursements' and return of the Startup capital all I ,my family and/ or corporations received from WMMA was \$240,00 for 3.5months of hourly contractual billing and not one cent for any Investor enrollment as they appeared on WMMA's sight in the 2nd half of 2011!

8]Therefore any omissions and or disclosures that the SEC alleges were not in the WMMA PPMS was solely the responsibility of its admitted author, Mike Nwugugu whose admission In his12/10/12 Chartis insurance claim, to his being the sole writer and filer of the WMMA PPMS cannot be alleged as my doing. In addition; the record demonstrates that each and every WMMA employee , as in their respective employment contracts ,do not report to me making the complaint allegation that I was a controlling person silly! Luxs ' deposition and in addition the WMMA/MKMA service contract makes it very clear that MKMA had no authority to Bind WMMA, the PPMs make clear that no one is authorized to MAKE ANY REPRESENTATIONS ABOUT WMMA EXCEPT TO THE EXTENT DISCLOSED IN THE PPMS,. THEREFORE; SINCE ALL INVESTORS WARRENTED THAT THEY READ THE PPMS' AND RECEIVED ANSWERS TO ALL QUESTIONS THAT THEY HAD ; KNEW OF MY FELONY BEFORE THEY INVESTED AS The BRADY WITNESS ADMIT THAT WERE INVESTORS' THE DIVISIONS' LAME,LIMP COMPLAINT ALLEGES THAT INVESTORS WERE INFORMED OF MY FELONY,BUT JUST BEFORE THEY INVESTEDIs that a crime even if true which it was not as Brady proves!?[AS IF THAT MEANS ANYTHING AS IT DEMONSTRATES KNOWLEDGE PRIOR TO MAKING AN INVESTMENT .]THE DIVISON KNEW THE FALSITY OF SUCH AN ALLEGATION AS 3 OF THE INVESTORS' IN BRADY DISCLOSURES' PUTS' THEIR RESPECTIVE KNOWLEDGE PRIOR TO THE FINISH OF INTERVIWS' LET ALONE JUST 45 DAYS BEFORE[+/-] WHEN EACH INVESTED..THIS FACT MAKES THE FALSITY OF THE COMPLAINTS DISENGENUOUS ALLEGATION AGAINST ME ALL THE MORE vicious!!AS IT SET OFF WITH AN ADMISSION THAT I DID INFORM THEM BEFORE THEY INVESTED,BUT CASTES A SHADOW OVER THE TRUE HONEST DISCLOSURE BY ATTEMPTING TO MAKE IT A APPEAR THAT IT WAS A RUSHED DISCLOSURE AND THAT THE INVESTORS MIND COULD NOT COPE WITH THE NEW FELONY DISCLOSURE FAST ENOUGH TO STOP THEIR]RESPECTIVE HANDS FROM WRITING THE CHECKS!!!!What are we to do when a prosecutor does not have a case and cant even figure out anymore untrue allegation's so they come up with a fact that is legal disclosure and try to make the disclosure a bad one because they allege it was done at the last minute when they knew that was false!!.

9]HOW FILTHY CAN ONE GET??So even when I perform an honest act the sleazy divisions' team besmirches the honor of the act by casting aspersions to make me appear as I was not acting truthfully quick enough!. The complaint is full of these type mischaracterizations' which the SEC enforcement division knew would anger the previous commissioners' to play God and permit an honest man to be tried! To trump that the commission[previous when I refer to the commission]Also rearranged a violating adjl to sit in my case knowing that his appellation as the Grim Reaper[or the SEC Mueller] would finish the JOB. That he did [By the biased dissolution of my postponement after Judge Feolak

granted it to me],he denys' me a lawyer when mine resigned]and then disparages Mr. Agostini ,coercing him with Mc Grath, as his team mate, soiling the appearance of good conduct, filthening up his hands in contempt of the 2nd circuit's stay order! How can anyone condone this in-house way of life. !In other words the complaint makes allegations' that the division knew to be false and contravened by their own evidence.

10]There is absolutely no case as the facts the SEC has had before the complaint was filed also prove that there is no fact[s] that the SEC can allege against me unless they have already suborned the perjury of the investors[Such is apparently the case as there is not one investor who had not perjured himself or made material omissions of fact in the Judge Gamberedella Hearings. aAs contained in the dishonest shareholders meeting wherein the [REDACTED] when colluding and conspiring with the investors' to get their crooked story right admits on [SEE EX A of the defendants' Wells response]page 17;120-125,"that the WMMA Board of Director had the ultimate power to fire MKMA and me!!They controlled the company , not me, as Mr. Lux ,depositions' also independently corroborate!.

11]PLEASE ASK MR MCGRATH ,UNDER A LIE DETECTOR TEST, AND ASK THEHEAD OF THE NEWYORK DIVISIONA MS BRENDA SOMETHING, UNDER A LIE DETECTOR TEST.IF THIS COMMISSION EVER RELYS ON THE DIVISIONS ALLEGATIONS' AGAINST DEFENDANTS WHITHOUT AN INDEPENDANT INVESTIGATION? A LOT OF WRONG PEOPLES LIVES WILL BE HARMED AS MINE AND JOANS WERE..

The other allegations' contained in the OIP were also disproven by sections of the WMMA PPMS disclosures; which clearly demonstrate that the investors warranted they were accredited in their respective subscription agreements and it was not my consulting job to do so ant way. The WMMA/MKMA service contract excludes that type responsibility. In addition it was up to the 2controllingboardmembers mr Lux CEO and Main to finalize their participation as investor operators rather than my not performing due diligence; as alleged in the OIP to insure compliance which was not my job and which the FBI admitted tht it relied on the oath under penalty of perjury being adequate to rely on as the investors subscriptions contained the oath .That the PPMS' specifically informed that the company was losing money and that, converse to the OIP allegations that I informed investors that there was huge funds available for WMMA the investors were informed in the PPMs, which they all warranted in the subscription agreement that no one was authorized to make any statements that were not contained in the Ppm and that no investor[s] should rely on any such representations .In fact the OIP allegations when compared against the Subscription warrantees to the contrary; disproved the OIP allegations without any cross of PLAINTIFS' WITNESS BEING NEEDED TO DISPROVE THE OIP ALLEGATIONS AGAINST ME. .that WMMA was a first stage startup company and that Investors ran the risk of loss of their entire investment.. that WMMA was losing money ..,that there were no investors' were backed up as the Oip allegations stated! "That there is no assurance that WMMA will be able to enroll additional investors in the Risk section of the PPM thus proving the allegation that I informed investor that there was back up money is absurd on its face and contravened by the PPMS disclaimers!... THE Oip allegations that the PPM did not advise that the imc database had not been hooked up and might not operate was another fraudulent allegation as the risk section of the PPM clearly informed that the IMc database had not yet been tested as there was no WMMMA website to market the pay per veiw services and it might not work and if so WMMA would be irreparably damaged. Yet the complaint disregarded that risk admission and claimed there was no disclosure when it was right in their face!!

IN OTHER WORD THE SEC MADE ALLEGATIONS THAT HAD NOTHING TO DO WITH ME AND THAT MR NWUGUGUS ADMISSIONS THAT HE WROTE IT EXCULPATED ME ABOUT .

13]With out my being a controlling person, without my being the alleged author of the WMMA PPMS and specifically Mr. Lux's deposition making it clear that he was a disinterested Board member as was accepted by the SEC & Mr. Main was also disinterested and with Mr.lux they were the majority board members; the majority of WMMAS' Board was disinterested, with respect to my alleged interests. The aforementioned fact proved that the board resolutions fully authorized actions that are not able to be contested and prove that I was not a controlling person as alleged in the OIP. Mr. Nwugugus' Chartis insurance claim of 12/10/12 gave validity to the WMMA/MKMA service contract not being the work product of Edward M Daspin as disingenuously alleged in the OIP. In other words the division knew that they were fabricating disingenuous complaint allegations that set up the commissioners to initiate it and Judge Grimes repeated the errors by disregarding any facts that contravened the allegations in the OIP ad Nauseum .

14] I remember mr BerylWolk the owner of imc[Now deceased]who declared that he was offered \$90million from one of his investors looking to pur. I remember an incident that was so outlandish as to make this case comical. The brady disclosures also covered Mr. Wolk, the IMC, Owner,he gave WMMA the database ,that I had secured exclusive MMA world wide rights for WMMA and which I forgave a million dollar fee for!{What person in their right mind could allege I had pecuniary interests to steal and or remove assets from a Company that I contributed over \$3millionin capital to deferring any payments as subordinated fees for services ad nauseum! to ;when all i needed to do was ask for payment when services were rendered, no not me instead i punish my pecuniary interests, identify with WMMa to my own economic disinterests and im still alleged as a thief!

15]The division knew that Judge Theodor Alpert, federal bankruptcy judge, in the Chamco matter ,had just found me innocent of all allegations and over 15counts similar to those hear against me on Jan 1,2013!Judge Alpert at first believed I was guilty as the allegations were false and he did not know that Until the last months of the hearings .Just as Judge Gambreddella , in the WMMA involuntary found no wrongdoing and yet the prosecutors saw Mr Berjedekian and Sullivan and Mr. Mains' file fraudulent declarations' in the WMMA bankruptcy and they had found their own [REDACTED] lied about kn knowing about my felony until the minutes before she invested as she contravened her own recital inBrady.,,The Prosecutors are criminals' .The President and or this Commission should fire them .Restitution for the Commission ruining the twilight years with my wife over a case that was fraudulently induced and that was shown to be disingenuous to anyone who paid for his compensation by reading the submission in this matter had to know was a tragic, depraved ,fraudulent complaint and OIP, that should never have been filed and once filed should have been vacated as the filth quickly eased out of the corners of the Oip proving the allegations against me false.

16]It was the false allegations that the WMMA prosecutors tied us up with that prohibited WMMA to sue the Enterprise and I must inform you I believe that the division and powers to be in the New York office continued to fabricate false allegations' about Mr. Agostini and me; that had a monetary interest in the enterprises affairs. Why else would mc Grath continue knowing each allegation he made was false?? When the facts disprove each and every allegation in theOIP? He had Judge Grimes right In his hand so he knew he could count on a victory and this was born out when Judge Grimes, despite the proofs that M.r WOLK declared he has been offered more than my and MKMAs appraisal for the IMC

database and looked the other way and took the SEC appraisers' word that MKMA and I had inflated the value above Imcs' goodwill on its balance sheet to defraud them. by doing that it proved that the Grimes was either on the take, owed some blind fiduciary to Judge Murray who was on the take as she had no real reason to throw Judge Feolak off the bench! or had an economic motive to rule against the evidence.

17] He did the same thing by uphold in the divisions' claim that the Ppm did not point out that WMMA would be irreparably harmed if the database did not work when it was right there in the risk section ,and after he saw that the subscription agreement warranted that WMMA was a startup, the investors could lose their entire investment and that the compilation of oct 31,2011Wmma/WDi compilation balance sheet informed the investors not to use the balance sheet for investment purposes and the boilerplate explained that only certified balance sheets and financials should be relied upon. Judge Grimes still found that the 2 investors :loket and Heosterkamp counted on the good will value and he alleged we defrauded them despite their admission that only Puccio and Mc farlane defrauded them!! I knew that this was a judge that should not be one. Phis findings flew in the face of the fcts just as he dissolved the postponement flew against Judge Feolaks finding that id be irreparably damaged if any forced my testimony! proved that the judge didn't care if the evidence proved his opinion wrong

18].In other words this case gives a lot of Red alarms that should be looked into, there is a thief in the SECS midst. Some one is on the take and if you don't investigate you ll be breaching your fiduciary to the President a man who believe in all of you as I do. I will send a heads up to Our President so hell be able to cover you and his own administration's. I would be honored to assist in that effort for reasonable compensation of \$350,00 an hour and reasonable expense reimbursement which WMMA paid me 8years ago.. !The prosecutors had more than a disinterested interest in the affairs of Craig,mc farlaneand just let them go over their heads looking to trump a 45year old felony into a home run to try to prove me guilty as an abuser when the facts demonstrated that I was WMMA protector! They sold the prior commissioners on BS and they have a reason to be punished. Don't let yourselves be lulled into sleep as the torts they made on your predecessors will be repeated. Where there is smoke there is fire. I would relish in a consulting assignment for my \$350.000 hour rate being a defendants' ombudsmen and working for this commission under President Trump. By doing that id forget the damages and earn the money helping our great country and working for the greatest president we will ever have. With that cash flow I could afford a team of nurses for Joan when I had to travel and or report to you all. Some one must do it and its insurance for you and our President. its essential as only one case wherein a defendant is being abused is needed to provide justice instead of abuse.

You have 120 cases a year and if 10% were brought for improper purposes I'm sure you would want to see the flip side for justice. It's insurance and remember big defendants bite back! You need a street minded business acquirer who knows the difference between a balance sheet and p/I statement and who doesn't trust anyone except those he reports to. I have acquired over 300 corporations' in almost all industry's' so this experience together with the fact that as a pro See I never lost any case as a defendant will enable you to see the value .I am a dealmaker much in the same mold as our President. Any agency Would have need for my particular skills. I am also a lot more inexpensive than the consultants the SEX used to fabricate their opinions On information and belief one was 41,000.00an hour and the other \$1,500/00 !At \$350.00an hour in a steal and 80 years young. This brings up an interesting point how much are we, the SEC paying for consultants' have appraisal over 10,000 business in over 50yers and have much more experience than the man the Sec hired for over \$1.000.00 an hour.I

know our President doesn't like to pay more than a market price for services, nor do I! So it seems to me that's another area that needs cleaning.

19) I was not a controlling person, I was not director or officer or shareholder, on a FIFO basis I did not receive on nickel of investment banking and or human resources fees. I was not able to make any statement that was not continued in the PPMS and did not make any as only the PPMS disclosures could be relied upon SEE PGS 3 and Pgs' 4 of any PPM as proof. I was not required by the service contract to become a credit manager and or attest to the accuracy of the subscription agreements warranties nor was the FBI when they passed on White House appointees based on the taking of the oath. I lost 7 as witness to death: Mr Giorgi Kaufman, Mr. Frank Price, Mr Beryl Wolk, Mr Donald Lockett; To [REDACTED] impairment My wife Joan Daspin to [REDACTED], Mr Lawrence Lux to a [REDACTED] Mr Wayne Craig [REDACTED] All of whom were indispensable material witness who collectively would contravene each and every witness and contravene the OIP allegations and now can't perform. I also affirm the accuracy of the enclosed brief and request this commission sign the orders enclosed.

Respectfully,



Edward M Daspin pro See

Cc THE PRESIDENT OF THE UNITED STATES , THE HONORABLE DONALD J TRUMP

THE HONORABLE VICE PRESIDENT OF THE UNITED STATES THE HONORABLE MICHAEL PENCE

THE HONORABLE SPEAKER OF THE HOUSE THE HONORABLE PAUL RYAN [PLEASE STAY ABOARD; HE AND WE NEED YOU. IN 8 YEARS YOU'RE A SHOE IN FOR PRESIDENT! MOVE YOUR FAMILY TO WASHINGTON PLEASE..]

The Attorney General of The United States

The Inspector General of the United States

THE HON CAROL FEOLAK, THE HONORABLE JAMES GRIMES, MR NICHALAS KOLODNEY, MICHAEL SHAPANKA, MR LUIGI AGOSTINI, MR LAWRENCE LUX, MR KEVIN MCGRATH, MR BARRY OCONLL

Date: 8/27/2018

Commission Order #2:

For good cause the Commission hereby orders, to vacate the complaint filed by the SEC against Edward M. Daspin in case 31659 is hereby vacated for good cause shown by the order as contained in Lucia vs. SEC. The Commission hereby orders,

-----date/ 8/27/18

Or

In the alternative, the Commission orders that Mr. Daspin be reimburse the legal fees by the SEC to compensate for his loss of legal fees from the issuer and for good cause shown.

Be it ordered by the commission on -date

-----date/ 8/27/18

HARD COPY

Date: 8/27/2018

Commission Order #1:

For good cause the Commission hereby orders, that Edward M. Daspin's SEC judgement and the financial penalties the SEC judgement in case 31659 are hereby vacated for good cause shown by the order as contained in Lucia vs. SEC. The Commission hereby orders, **BLA**

Be it ordered by the commission on -date

BLA

Date: 8/27/2018

HARD COPY

Commission Order #3:

For good cause the Commission hereby orders, that Edward M. Daspin's SEC judgement be paid for compensatory damages of \$2.8 million us dollars to compensate him for his waste of time as discussed in the Brief and declaration 8/25/2018 by Mr. Daspin.

Be it ordered by the commission on -date

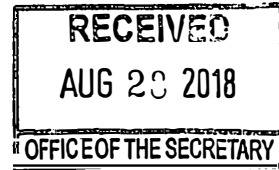
or

The Commission hereby retains Mr. Daspin corporation, CBI Inc. and Mr. May's corporation McKenzie Mergers and Acquisition Inc. to a four year contract commencing Oct. 1, 2018 with payment at \$350 per hr. straight time, for Mr. Daspin and his staff to become ombudsmen for potential SEC inhouse Defendants subsequent to Wells Letter and response prior to an initiation of a complaint to confidentially report their findings to the Commissioners.

Be it ordered by the commission on -date

Date: 8/25/2018

HARD COPY



Dear Mr. Fields,

I enclose brief seeking to vacate the complaint, to void the default judgement and financial penalties in case # 316509 and such other relief as requested in the three order attached. On the last page of the brief is the certificate of service and the declaration Edward M. Daspin in support of the relief requested. Thank you for the service you rendered to me over four years.

Respectfully,

A handwritten signature in black ink, appearing to read "Edward M. Daspin".

Edward M. Daspin.