

Edward M Daspin Pro SEE

██████████ Boonton N.J. ██████████

██████████ ██████████@optonline.net

3-16509
case3-16905At 9/7/18

Reply to enforcements reply to my 8/25/18 submissions Declaration under the laws of the United States. I know if I misstate any facts that I'm subject to punishment and I submit this declaration under the laws of the United States.

1]I have read the enforcement divisions' response to the factual statements made to my request that this commission vacate the complaint that was fraudulently induced by the Wells letters complete omission of the material facts which my prior submissions enunciate with specificity and which prove my innocence of all the allegations contained in the WELLS letter which was used to initiate the complaint st at these defendant's which I ask the commission to free me and void Mr. Agostinis' settlement coerced and suborned of perjury and return his financial payments' as in my prior submissions' my 8/25/18 and this 9/6/18 responsiveness to judge Murrays and the commissions orders.

2]My responsiveness should be judicially noted as the divisions' lack of reply to the factual statements ive made about the material fact omissions that were not contained in their wells response to this commission ;and which consisted of omissions of the material facts they ,with malice of forethought, left out of WELLS and the complaint they submitted along with the W ells letter toward the plaintiff side and which the ombudsmen's 'role to provide the commission with its own independent confidential insight; which it believes the commission should be made aware of ;prior to initiating an action against a potential defendant or the commission is swayed to rant a NO BILL Action !

3]I object to the prosecutions statement that I want a ,JOB, although it seems they have asked for such a job, and maybe should not have received it ;if this case is used to judge performance as its initiation by the Commission was based upon the commission receiving a Wells letter ,and perhaps a draft of the complaint, which omits ' scores of material facts, and by such fraud perpetrated against the commission and subsequently the adjl s, enforcement stole A home run of ALLEGED a guilt against innocent business men ;while the prosecution practiced fraud by the omission's' of material facts ,the insertions of facts that never happened, and by construction of allegation's knowing the falsity of same to inflame an adjl into biased rulings thinking he was protecting society when the facts proved he erred due to the prosecutorial misconduct I complain of.That your lack of a response proves my complaints' statements' ae true. !!

BY NOT CONTRAVENEING THE FACTS CONTAINED IN MY SUBMISIONS' THE INFERNCE IS THEY ARE TRUE AND BASED UPON THAT JUDICIAL NOTICE SHOULD BE TAKEN; I REQUEST THAT THE COMMISSIONERS' VACATE THE COMPLAINT ,AND AWARD COMPENSATORY DAMAGES, BASED ON YOUR ADMISSION WHICH WE ALL KNOW IS TRUE OR, AT THEIR SOLE OPTION PUT ME TO WORK TO PROTECT THEM FROM ISSUES AS HAPPENED HERE.

The government has the right to pay a whistleblower claim as you chose to award to Ms'Puccio out of the same pool funding. if my plan doesn't work in reducing the law suits against innocents' which will be

proved by the commissioner's' not initiating a lawsuit and rejecting your Wells letter[s]; than we are doing the right thing for our society.

HERE THE PROSECUTION REATTREATS' UNDER SOME PRETENSE TO DIVERT ATTENTION AWAY FROM THE COMMISSION OF THE CRIMES I ACCUSE YOUR TEAM WITH, AND WHICH YOU CANNOT ANSWER SO THAT THEY ARE ALL PRESUMED BY THIS COMMISSION TO BE TRUE, AND THEY ARE EVERY LAST ONE OF THEM!

That's' right enforcement omitted the material fact that I and my family invested over \$4,400,000.00 in capital, which after deducting \$1,000,000.00 for IMCS; FORGIVENESS!! left \$3,400,000.00; and after payment of the \$715,000.00 left \$1,800,000.00 and \$400,000.00 of contingent AR.

Now who in their right mind could possibly build a case around my use of my child [WMMA], created in my basement offices and at a country clubs conference room, as being my piggy bank and my milking the WMMA/WDI of its cash when I'm all in for a resounding cost of \$4,000,000.00!!!! Which was fully subordinated and contingent on revenue of either equity and/or pretax!!

How can anyone make a straight face, when I forgave a \$1,000,000.00 fee for IMC and only received \$80,000.00 year as compensation to feed 5MKMA/CBI employees, THERE WAS AN OMISSION OF A MATERIAL FACTS, SO HUGE AS TO FLOOD THE WILLFULLY DISENGENUOUS WELLS SUBMISSION AND THE: Complaint's allegations off into the ocean were I hope the mother of a mother shark will eat it!

I only had an economic opportunity, if it was profitable as a that's when the bulk of the equity [the subordinated fees earned on outstanding \$2,400,000.00] could only be paid out of success not losses. I made the investment believing it would succeed! If the commission knew the truth which was purposely omitted by enforcements' Prosecutors they would give me a medal Not a Wells initiated lawsuit.

!Let this be an eye opener that the Presidents' new Commissioners won't tolerate such conduct by their subordinates, won't permit subornation of perjury and or meddling with the Brady disclosures and neither will the adjls who also were pissed on, into believing, that enforcement would be honest, truthful and that they could count on the veracity in the WELLS and in the complaints' allegations' about me. This discrete enforcement Prosecution team members assigned to me, were errant members of an enterprise whether willingly and/or inadvertently and participated in an act of wrongdoing, abuse of discretion, and breach of their fiduciary to all of us..

action. [They must have a lack of respect for those that had respected them not to omit material facts and to make misstatements of fact that resulted in a \$1,500,000.00 cost to the SEC knowing that the action which was elicited by omission of material facts also harmed 3 innocent persons and their families.

The reason that enforcement won't respond is clear. THEY HAVE NO DEFENSE. I REST MY REQUEST FOR A VACATED ORDER WITH THIS COMMISSION

RESPECTFULLY

EM DASPIN PRO See

Certificate of service on 9/7/18 same Honorable persons as on 9/6/18 same emails to MS shields for Judge Murray, Judge Grimes, Judge Feolak and the other individuals as on the 9/6/18 Musy go out on the 7th.

Edward M Daspin, Pro See,

██████████, Boonton, N.J. ██████████

██████████@optonline.net ██████████

case 3-16509 AT 8/5/18 commissioners

Supplemental modification Declaration and Brief Re: 8/25/18 ; to the COMMISSIONERS
submissions & Apology & same submission and Apology to Judge. HON. Judge Murrey

Hon. Judge. Grimes Apology

Dear Mr. Fields; & Mrs Shields;

I write to both of you because although before I received the Commissioners' order I had already sent the 8/25/18 submissions to them. Subsequently I received Judge Murray's order; but I write this to the Commissioners with respect to the motion to vacate and such other relief as they wish to consider. the remainder I write to Judge Murray ;to be responsive to her request for information and issues that I believe must be considered and for the reasons recited herein.

1) I declare under the laws of the United States that the following is true, except for information and belief statement. I know if the foregoing is willfully false I will be subject to punishment.

2) I include the prior 8/25/18 submissions' by reference I include them as if attached; those prior submissions are binding on me except where I modify, them hereunder ;and in all of the areas they shall be considered my belief and factual, except where stated here which supersedes ' them in all places recited here.

3) I have given a lot of thought to the issues recited in the 8/25/18 submissions and in several ways I shall cover here as I contradict myself in certain 8/25/18 submissions' statements that are heard in resolved. Enforcements Wells and subsequent Complaint contained Omissions' of material facts, misrepresentations ' of alleged facts which were untrue representations'; and by their submissions committed fraud on the Commissioners and subsequently the AIDJS' In Good faith I cannot blame you for the fraud the perpetrated all of us I apologize! As I was trying to cover the Ombudsmen role I wanted your consideration of, to be paid out of your whistleblower fund; I realized that the size of the field you are being asked to cover is monumental compared to the 5 commissioners we use to capture wrong doers. In that regard I believe that since your focus is prosecution and since with that in mind its difficult to recognize that enforcements "facts" are not so, as you trust them! That's the sole reason that I feel a duty to offset the perceptions' made by your reading fiction and have an outside firm, with street smarts, report to you the other side if it exists .

4) In that manner the embarrassment you must feel by initiating a lawsuit against a person completely innocent should be dramatically reduced if I focus on the other side and report situations' as here wherein this enforcement team was so devious and enamored of self that they presumed you would not catch the sophistry and fall victim to it! For this error I excuse you. However I cannot in good faith excuse that discrete personnel and enforcement team that knew the trash they were sending to you , knew the falsity of the allegations' and went forward and willing to convict an innocent group of 3 defendants. The error , one of them was not afraid to prove that they had defrauded their own

bosses'.in that regard the agency is still a proper defendant and the punishment ,if youll' permit is a cleansing of that portion of the SEC system wherein the in-house Dodd frank adjudicators will not get a case, as hopefully we will cut it off at the pass. In your haste to believe their submissions' true; because in this case, which passed the enforcement Guru at the top, who is himself overworked and underpaid as you all, each of your misplaced trust in their work product ;they exposed each of you to ridicule from me and for this I am sorry Who and I a spoke in a wheel, to show you the problem and offer a solution which I believe if taken will rid you of the misconception that INHOUSE has to be a one way street.

5]If we marry a little bit of Judge Feolaks' insight with judge Murreys convictions than a happy medium can be achieved .I have listened to judge Murrey mentoring about not permitting motions to dismiss to the 8 defendants that requested it, as she in essence in a humble sweet manner said in essence

:I wont give it as i feel by doing so I would be overruling the commissioners edict[initiation of the complaint]when they are to have the first right to appeal and I feel by granting it im overruling those who are to overrule me!

By not giving defedants. that right of dismissal we were denying the rights under the rules .I respect her deference but to use it to further disadvantage defendants already reeling for loss of the 3 rights referred to hearin ; and from the irrevocable appellate rights as meaningful ,the federal district court's must ordinarily use, as the law of the case. the findings' of the adjl is therefore such a diminution of our constitutional rights in the rules of civil procedure that we must temper the inhouse conundrum down with the ombudsmen if we are to retain an inherently fair system to preserve our freedom and right t to the benefits' so removed which congress in its lack of wisdom created in DODdFRANK as it's Knee Jerk reaction to the meltdown by granting the tort feasor[THESEC And Fed] for that meltdown to have more power against the citizens who were not responsible for the meltdown and victims of it, to the failure of the feds and SEC not getting together BEFORE!

6][AS IM SUGGESTING THE SEC DO IT ON ITS OWN BEFORE THERECURANCE OF AN OTHER MELTDOWN THAT WILL CROP ITS UGLY HEAD UP FROM THOSE DEFENDANTS' HARMED,AS WAS DONE HERE IN DELUCIA.WE MUST MAKE THE IN-HOUSE SYSTEM TRANSPARENT AND ABIDE OUR ADJLS BY THE RULES TO COUNTERBALANCE THE PERSUIT OF GUILT, SO AS TO MODERATE OUR INHOUSE BATTING AVERAGE WITH UNDERSANDING THAT OUR SYSTEM OF JUSTICIE DEMANDS THE PERCEPTION OF AS WELL AS FACTUALLY ;THAT WE PROVIDE DEFENDANTS A FAIR SHAKE! TO MOVE OUR IN-HOUSE RATIOS CLOSER TO ONE STANDARD DEVIATION AWAY FROM THE FEDERAL DISTRICT COURT SEC AVERAGE PERFORMANCE OF DEFENDANT LOSSES' MORE INTO THE 68%, AWAY FROM THE 90% KILL RATIO WHICH WHAT THE IN HOUSE WAS FOR THE 3YEARS ENDING3/3/15!IS ,WE MUST ALSO TAKE INTO ACCOUNT THE COMMISIONS' FIRST RIGHT OF APPEAL AND ADDING IT TO DEFENANT LOSSES BRINGS INHOUSE UP TO ONLY A 6% DEFENDANT WIN OF INNOCENCE [ASSUMING THAT HALF THE APPEALS REVERSE A DEFENDANT WIN TO A LOSS!COMPARED TO A FEDERAL DISTRICT COURTS'DEFENDANTS WIN RATIO OF 32%THATS' 5 STANDARD DEVIATIONS' FROM THE FEDERAL DISTRICT COURT SEC AVERAGE.IT CANT BE THAT,IN HOUSE WE HAVE A DISPROPORTIONATE DEFENDANT GUILT IN HOUSEOF 90-95% AND IN FEDERAL DISTRICT COURT ONLY68% DEFENDANT LOSS!!AVERAGES ARE AVERAGES !AND THE DIFFERENCE IN THE RESULT IS DAMING.WE MUSTNOTPERMIT ENOCEMENT TO RULE WHICH CASES GO INHOUSE AS THER SELETIVITYMAY SCANT THE DISPARITY BEYOUND RECOGNINTION.LETSUSE THE FEDERAL COUTLOTTERY SO THAT THE SELECTIVITY OF THEPROSECUTOR DOESN'T ALSO BIAS TH

RESULTS. IF WE CUT THE LEGS OFF FOUR RUNNERS NONE WOULD WIN. THAT NOT WHAT THE USA IS ALL ABOUT., IF THE ABOVE HYPOTHETICAL IS CORRECT AND OR CLOSER TO THE TRUTH THAN EVEN I AM

7] **the Commission is the only venue to vacate this Wells initiation law suit complaint order.** If that is done all inhouse falls by the wayside ;except the compensatory and ive agreed if youll have me for a one year test, or all the way ,to provide a the best team of dealmakers who handled small medium and large private and Public company's' ,be up to speed by Jan 1,2019 and use the interum to create the protocols hire the teams that will need a faze out of their private practice to be ready approved by you so that a smooth transition will ensue .Ill start with a staff of 4 for that and to design with enforcement nd Judge Murrey the proto calls of our operations and what ever your designee wants included an or deleted, of the dealmakers and lawyers i respect over 20years to serve as ombudsmen including myself. I have a defendants 'lawyer who never lost a corporate defendants lawsuit while as I as ProsSee never lost as an individual defense.. we can nor should any longer ignore..its a little misplaced; but humble pie that the in-house must play by its' own rules and therefore when she made that decision she should have excused herself as my opinion so would have recommendation on that case as that's' not good reason. If the ajls are to exploit the role we gave them then they must rule based on the facts to offer defendants' what little DoddFrank offers them until the receive meaningful judicial review[bit its too late as the Federal judges ,must accept as fact the lower adjls findings of fact, that were slanted by the elimination of jury, full discovery and due process. That's' what wrong with the system and my strategic plan will go a long way to correct huge amount of injustice before its initiated with some micro management.. .

8] Neither any man and/ or any woman should be criticized for sticking up for those we trust and so I apologize to you for the misplaced trust each of you demonstrated by believing in the false statements, allegations and /They purposely deleted material information that fully exculpates me and the others from all the WELLS allegations and All the Complaints allegations and they had focused on the minute of the RES, had been given prior to the Wells the documents an ha the staff to ascertain that their lynchpins' upon which their allegations rested were hopelessly false and would if prosecuted be a patent **and manifest injustice** on these defendants' .Mr LUX an Particularly MR Agostini should be set free as Mr Agostini's settlement was coerced by an adjl not yet properly appointed and who suffered from the same trust and had 30 cases to cover in depth ; who I stimulated after he demonstrated the Bias that comes with trust. He dissolved my postponement in the face of finding as fact by that wonderful servant THE HONORABLE BRAVE Judge Carol Feolak FOUND , that if forced to participate in any hearing id be irreparably harmed AND SHE WAS RIGHT! .Judge Grimes dissolution of her postponement sine die was thought to be bias and prejudicial, and it was, but it arose from his belief that enforcement would not lead him astray. Silly him ; as they did to the same extent as im sure they cajoled poor judge Murrey to flip judges. In retrospect ;her actions were so obviously in complete disregard of demonstrating where her heart was, that that transparency requires remediation BEFORE INITIATION OF A CASE. By this Commmission in House where there is no escape from prosecution with a no holds barred chief Judge beleif as enforcement puts the inhouse issues solely before the team that can and will be strong and unrelenting based on their belief in the guilt to the exclusion of some ajls belief to look around the corners'[4] of the complaint to see if its logical!!!.NOT HEREASIT WAS THE MOST ILLOGICAL OF ALL ATTEMPTS BY ALAW TEAM WHICH MAKES ME BELIEVE THAT THEY WERE NOMONITERED AT ALL DESPITEND KOLODNEYS SELECTION WHICH HE PARTICIPATED WITH THEM INSTEAD OF CHECKING

THEM ,THEY RAN RAMPANT LIKE A WILD HORSE AND MR KOLODNEY RATHER THAN REPORT THE OBVIOUS MISUSE OF POWER WENT RIGHT IN WITH THEM!!

9]How anyone, except those reliant on enforcements truthfulness could ever make an allegation that I in fact pissed on the company born like a son in my basement ;and for which I purposely struced that all fees to be paid were subordinate and whole contingent on positive cash flow and only10% at that is beyond me, Look at the 1/20/11WMMA/CBI/MKMA service contract carefully .It makes all fees fully contingent on availability of cash flow and subordinates the fees earned to payment only from10%of equity or pretax and in that regard after all investors' employees were caught up in the deferred compensation they to subordinate to keep WMMA FINANCIALLY HEALTHY.THEN LOOK AT THE INVESTMENT CBI,I,MY WIFE MADE and MKMA made!. I FORGAVE A MILLION DOLLAR FEE!! FOR THE IMC database acquisition. After deducting my wives ' repayments of loans[without interest paid],T and E American Express authorized travel with the WMMA CEO And COO of ring operations Mr Jerryl and start up expenses totaling about\$515,000.00.00with travel twice, to collectively 3 continents with a 4 person team of about \$110,000.00.The remaining WMMA payments to my Side of the ledger was10% of the \$2.4million Investors money.**\$240,000. but deferred to the 00**and they knew that they were paying it to MKMA s 10% was in eachs employment contract showing the WMMA/CBi/MKMa service contract and that wqw lImkm received applied against MKMAs Hourly rates for the first 6months **2nd half, when investments came in**. During the first half by a series of payments from my wife and Mr. Mains investments of capital In WMMAH and down streamed to WMMA and paid out from the aggregate incoming funds of\$725,000.00 at the rate of \$25,000.0a month until the Puccio, Sullivan an Berjedekian s \$1million in August 2011 came into WMMA, !It had about\$1,200,000.00byyear end ne mr Sullivan, the man with no books!!calculated WMMA's oct31,2011Balance sheet contravening enforcements' lie that Mr. Agostini had not let his fellow financial officers not see the check stubs and financial books that their own bookkeeper took for them! or their **bookkeepers** See the books!

10]Are we to believe that Mr. Sullivan ,MsPuccio,Mr Berjedekian ,they paid her for no books' to review!!?? and no check stubs RIGHT!!Wouldnt that be a criminal fraud? to pay WMMA's bookkeeper to come to the office once a week to audit nothing if we are to believe the OIPS allegation that Mr Agostini denied access to the investors when no complaint was fled to the WMMA Board?? Seeking such relief. They planned to go to the Board in the dishonest shareholders meeting based on phony' allegations against MKMA and its alleged excessive fees! Yet the dec 8,2011 FEE haircut of 700% was 7months before that meeting thus proving the disingenuous allegations of enforcement as there was no more contingent and deferred fees to complaint of and I received an apology and holds harmless an indemnification. Maybe if the lawsuit is continued against me ill 3rd party them in as they will is prove **any milking by me an MR Agostini as their dec 8 apology is also an indemnification in my favor**. the enterprise member investors, the lies keep getting in their way!..??1yet enforcement wanted JudgeGrimes to believe it as he found all the OIO allegation is true against me! Did he really think id go away! I must tell you although I feel sorry and apologize profusely in retrospect the reason i won every case is that people actually think that judges that do their work can not find the lies when we know they can find the lies. If i found 100 here today and I did and ill find more if you need it. I will destroy the underpinnings of the WELLS and complaint if its desirable but all that will do is triply justify the relief I ask you to provide and permit me to serve you, Please.

11]The manifest injustice perpetrated by enforcement against all of us is incomprehensible. I apologize to enforcements head and can say, You knew not what you did when you selected mc Grath,

O'Connell Kolodny and Brenda????! The NEW York regional enforcement head. IS this what we must put up with. I do not want to deprecate them for morale reasons' but every once in a while both our President and I believe an example is well worth the heart wrenching that goes with the pitiable embarrassment. Lets save them as **they did know what they did and that's why I wont let them get away with it unless this commission finds compassion for myself, my wife my company.** I have provided a great strategic plan. Ill appear wherever you want with Joan so we can protect her to stand up to any interview so that I can gainfully work as between the omissions' of material facts ;the will full disingenuous complaints allegations and Wells as allegations and judge Grimes' findings I violated every complaints' allegations in the OIP which know you know so far off course as to stab me in the heart 5times. I am willing to accept that but ive been ruined by the mar to my reputation because all the false allegations by our government ,against me, against Mr Agostini and a judges' finding I was guilty of the oip allegations which now you know the falsity leaves us one way to make me whole, a cbis' strategic ombudsman's plan is worth 5times \$2,800,000.00 which is also the precise sum that judge Grimes assed disgorgement and legal costs of me!!!!. CBI And I will be satisfied by giving us the ability to work as it's the same sum I and Larry May lost at WMMA being diverted by the SEC from turning WMMA around.

12] If the SEC wants town 50% of WMMA's claims against the enterprise for defrauding the investors of WMMAH, my wife owned the warrants to purchase the shares and I gave her the same warrant form 10 years to purchase for \$1.00 the WMMAH common I exercised from Mr LUX And MR Main and since Mr Main and MS Puccio owns 2.5 and 1% respectively lets go after the civil Rico Enterprise Mr. McFarlane , Wayne Craig and any John and Jane Does persons 1-5 and corporate entity's' 1-10 and we will have at least 2 huge net worth individuals on information and belief! {Wayne \$50 million McFarlane \$25,000,000.00 ! } That ,in addition to the CBI Strategic plan, would be fine and my ability to help the Greatest, and if we sue the team that omitted the material facts to enforcement to sue for us is also a deal as they can rehabilitate themselves against McFarlane, Craig Wayne Barry Jerrel [we would offer to turn States evidence] so he doesn't lose his lawyers license and The Enforcement knows all the spots where the proofs lie against the enterprise members. as I do and they have greater recourses as that is who they should have sued in the first place as its responsible for bilking the WMMAH investors as the enterprise stole tangible and intangible assets and destroyed inits wake WMMA based on McFarlane an Wayne Craigs greed and avarice along with Monica Petty\$ and McFarlane, \$5000.00 wire], Wayne Craigs \$4,000.00 T shirts and theft of the WMMA logo counter fitted them to sell at his regional events and we have the proof on disc.,

13] Unless this complaint is vacated I motion for all My submissions in chronological order so I can tab each statement with a document and be done with this portion of the case! So that Judge Murrey herself can Judge for a summary disposition of the complaint, , I will need the funding which is required for a law firm as a result if the waste of the the E and O funds for the reasons recited which would be outstanding if not vacated by the commission and if no summary disposition filed herin with the vacate motion and in that order.

14] If however you gainfully employ me, CBI and MKMA as it has half the manpower and there is no extra costs as it \$350,000 and hour for a dealmaker and administrative legal secretary is another \$50,000 an hour [total \$400,00 plus out of pockets preapproved by the Commission. Which includes CBI overhead as well as MKMA as CBI will pay it. against the loans of \$374,000.00 and Main Equity with Mr. Mains consent with the startup capital as part and then for any t an E which was to be a reimbursement based, on an audit provided by the Financial investors Bookkeepers' accounting ! this obviously

inconsistent with enforcements frivolous willfully disingenuous allegation that the investors were not permitted into the check and chart of accounts by Mr Agostini ,contravened in the dishonest Shareholders' meeting as well as the investors bookkeeper hired in 2011 cuts' holes in the enforcements fraudulent allegations to the contrary; as stated In the complaint. I ts pretty hard to deny access when We have the bookkeepers payroll payments', when Ms' Biar,the SEC fraud auditor participates in omission of the material fact that she does not identify the loans incoming, the t and E expended by my Amex card,or the booked Startup expenses and only reports the outgoing to omitted the contra in an disingenuous attempt to make it appear that I received \$715,000.00knowing that of that allbut\$240,000.00was refunds for incoming Daspin money,loans/startup and t and e all backed up **voucher bills**. See the Shapanka accounting .

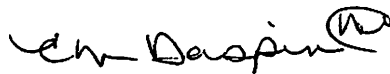
15]Yes! Enforcement committed a group of frauds against this commission and can correct it by vacating the complaint and regardless my request and order voiding the default judgement and financial penalty's so my wife may receive the refinancing she needs!!has the accounting and when the dishonest shareholders meeting disclose both mr Sullivan and Berjedekian finishing up WMMAS' books for an NEWCO acquisition and when each and every T and E submission was audited by Sullian ho stated that he was tired as he checked the disbursements of MKMA and CBI for 4 hours and couldn't find it a penny off!So much for the cfo and chief financial and administrator Mr Sullivan and Ms. Puccios validating they were exposed to allWMMAs books and records. .destroying the enforcement myth and omission of fact WMMA bookkeeper demonstrated the financial officers allegation that Mr Agostini in withheld the bank statements from them is perjurious as well as a reprehensible enforcement made up lie to make the commissioner as the ,chief judge and Judge Grimes that a real theft was going on when all that was going on was the **dishonest shareholder and enterprises cival RICO crimes** using enforcement to lazy to check and the adjls reliance on the enforcements representations and Warrentees that there was a confirmation of wrongfull acts when in fact the only wrongfull acts was enforcement making Ms Puccio a whistleblower, and enforcement cover up and omissions of the material facts they knew they had omitted ie; MRLuxs deposition,mr Nwgugus chartis claim admitting he not I wrote the WMMA PPMS, the dishonest shareholders meeting which Defendants did flash as WELL as, **exhibit A**, but which the enormous amount of work by the commissioners' and the adjls blinded their perception ;and now with the additional ombudsman's team the work should be reduced by 20%giving the Commissioners teams and the adjls the extra time to catch problems in the bud. Ive been efficanizing organizations over 300 times and startup reconstruction efforts ;I leaned with partners of my merchant banks' such as Charles SKIBO, my joint venture partner who was Sprints CEO, with Jay Pritzker the chair and CEO Hyatt hotels an Hyatt international and some AC casino reorganizations ,with Dr Robert Marick,Sr Vp Merck,and director of office and management under President Bush ,who acquired with me an custom yacht manufacturer up to 125 feet[The Spirit of California is still operating and going 3 times a day to Alcatraz],Mr Leo,VICE Chair Hausman Belding Hemmingway NYSE and cable aggregator, also President of Cerebral palsy who acquired with me a value added reseller of IMB equipment, Plus the experience of serving as a consultant to over 150 of those corporations' in every conceivable industry has given me insight that few men are fortunate to have. Add the litigation expertise that comes from50wins' is deserving of consideration.

16]As you know from a review of the 1/20/11wmma service contract MKMAs hourly rate was \$350.00an hour less than1/3of the fees that enforcement paid to the stooges rega4dless of their degrees, that they used as experts. That calculates to \$70,000.00amonth for the first half of 2011.Sincenot one investor

during 2011 as determined by judge Grimes, subscribed in WMMA before the end of the 2nd quarter or beginning of the 3rd quarter ,MKMAs deferred subordinated hourly earned fees came to \$420,000.00 for the first 6months efforts of 5persons on MKMAs side. We only were contractually able to obtain10%of the investors equity payments after deducting the loans ets as referred to before. That's' \$240,000.00. Therefore ;not only did we not receive a penny for the HR interviews or to humor enforcements out of the park fantasy Investment banking fees on a fifo basis although Mr Burnham WMMA's sr VPHUMAN recourses did receive 50%of the H/R fees. So in a cash basis the internal record keeping for his portion of H. fees was pegged against subscription investments .Beside all this factual evidence the total MKMA/CBI/My wife for her loans and T and E audited reimbursement invested in capital for work already performed was over\$3,400,000.00!! How IN THE WORLD COULD ANYONE CHARACTERIZE WMMA AS MY PIGGYBANK !How could they characterize payment over 3years of \$240,000.00 as milking WMMA when we left good will of \$000,000.00inWMMaand fully subordinated debt as you know id in the equity section!! Enforcement was sold by the enterprise an if you look carefully enough you' ll see BILL right in their with Terresa Puccio getting her a whistleblower contract. The enforcement team COULD NOT HAVE BELIEVED THE Puccio investors' self serving story when they saw the evidence I referenced hearin. So why did the not leave when before the Wells submissions the evidence we submitted to them and the dishonest shareholders meeting proved that the investoirs were par of the Bill Mcfarlane Enterprise , that he bribed them by their own description of his offerings and that they should trust him. Why did they eliminate all the material fact gained by our submissions to the subpoena, the lux admissions, the Nwugugu admissions to Chartis of being the WMMA PPM author, the Knowledge of the fraud perpetrated in the chap 11 case by their witness"

17]Something smells in Denmark and it would serve you well to find the answers to the riddle, Certainly they knew that they were omitting material facts to defraud this Commission ,of that we are sure. Why would they do that!?Who got to them as some one did and if they submit to a lie detector test as Government employees are required with no insinuations except the facts I have given we should get the culprits, whoever they are .if they know the government will give immunity to the person not the leader for the answer then we will win.That will assist you to make finding so if you are interested at least send the void judgement and financial penalties of this case so far by the Supreme Court. If you let me I ask the questions we will find out . Set it up for your own interests; to find out who ,what, when were and why. All We need is the 3 enforcement men, we need Brenda from the regional NEW YORK office and that should be enough except that Judge Murrey and judge Grimes will know and they are with you??Right?.

Respectfully



Edward M DASPIN Pro SEE

PS More when and if I receive an email of interest or your answers to my motions. Please I and joan need the order voiding the judgement and the financial penalties of judge Grimes Order.in the above captioned matter and with no decision as to other relief I've asked for unless you will be making a decision in the near future. There is a time requirement. If you do not wish to vacate please send me the disc and we will need a final order if you don't want to remit the legal costs wasted I hope this will not be necessary . }

CERTIFICATE OF SERVICE On9/6/18 i served ups to remit this service Edward m Daspin



CC THE PRESIDENT OF THE UNITED STATES.THE HONORABLE DONALD j TRUMP

THE VICE PRESIDENT OF THEUNITED STATES THE HONORABLE MICHAEL PENCE

THE HONORABLE SPEAKER OF THE UNITED STATES THE HONORABLE PAUL RYAN

**[PLEASE RECONSIDER HE NEEDS YOUAND YOUR FAMILY WOULDLOVEIT IN THE SUBURBS AS YOUR
GOING TO BE THENEXT PRESIDENT IF THE VICE PRESIDENT DOES NOT WANT TO SERVE, OR AFTER HIM
AYOUR A YOUNG MAN.GOD BLESS YOU YOUR LEADERSHIP IS NEEDED]**

THE HONORABLE ATTORNEY GENERAL OF THEUNITED STATES

THE HONORABLE INSPECTOR GENERAL,

JUDGES THE HONORABLE BRENDA MURREY

THE HONORABLE JAMES GRIMES

THE HONORABLE CAROL FEOLAK

Mr. Michael Skapanka, Mr kevin Mc Grath,Mr barry O connel, Mr nicholas kolodny