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NOV 14 2018
OFFICE OF THE SECRETARY

EDWARD M DASPIN PRO SEE

CASE3-165095 CASE 3-16509 11/13/18

██████████.NJ ██████████

██████████@OPTONLINE.NET,973-919-0070

Declaration and brief and certificate of service

Dear Mr. Field Dear MS Scheilds ';

Dear Judge Murray and the commissioners.

I swear under the laws of the united states that the following declaration is true to the best of my knowledge .i know if I willfully make any statement that I know to be false I would be subject to punishment.

1)I enclose an email I sent to Judge Murray and the contents contained therein are true based, on the amount of time left to be put in the federal district court law suit that I must file against the 2 holdover commissioners, the prosecutors' on my case including: MS kazon,Mr. Kolodny, Mr. McGrath, Mr. O' conell and the Newco enterprise members' including the WMMA investors' and the McGrath Sec enterprise members as John and Jane Does which will include all adjls[except Judge Carol Feolak] and every other commissioner under the Hon. Mary Joe White; who permitted this trash allegations about me to be filed as a complaint knowing that the inhouse jurisdiction consisted of 6 adjls all of whom were not appointed under the article 2 appointment 'Enforcement was aided an abated by those commissioners and judge Murray to fraudulently induce me and the other 150 defendants to spendou4elitigationfundson fake inferior officer adjls' who had a fiduciary to the very initiator of the complaint in the first place.

2)Their administration of each case and mine was riddled with conflicts of interest and worse; so that the commissioners', the adjls' and the enforcement division was all controlled by the commissioners. In poker they call that a rigged deck! It was worse as that fraudulent inducement also harmed me emotionally by Judge Grimes bias against Judge Feolaks order of postponement sine die and against me. He dissolved it in the face of a finding of fact that were anyone to do so they would irreparably harm ME!.All for naught. The defendants to be, as a group ,stole my 4,000 hours spent on a case that all of them knew was a kangaroo court and with no disclosure to my so I went in the dark. That is the conduct this agency is supposed to safeguard us and not inflict on us!. Thats' a fraud triple .In addition they stole my defense fund of one[1]million dollars and I need it to be represented by a law firm as im too ill at 80 to be a Pro see anymore. In addition when I file I will ask to consolidate the SEC case with it as it will require a jury from NewarkN.J I tried to give you a chance to repent but not a word only a notice for a hearing by a conflicted judge Murray whose recusal ive asked for. If she read the submissions, which she admits she has not ;yet she would know all about the conflicts. I cant' file counterclaims inhouse and wouldn't even if I could to file counterclaims against this agency's' personnel when they as individual's knew that the entire exercise was meaningless and would not stan helight of day.

3)Every dime I had my insurer spend which was approxamatly\$1,000,000.00 was defrauded by those to be named defendants for a conspiracy and collusion to hide the facts that all of them were compromised as inferior officers and they have a fiduciary to the commissioners as even **know inhouse is unconstitutional** as it violates the equal rights to all of us.The SEC inhouse eliminates the meaningful

judicial review to the circuit that the SEC federal defendants automatically receive as the circuit does not have to take an appeal from the commissioners first right of appeal. In federal district court those SEC defendants have the automatic right. **Its unconstitutional as a result and since the commission has the first right of appeal and since they initiated the complaint in the first place they are conflicted out so it's a circle which you get in communist countries not in America.**

4) I bless the Supreme court for having the wisdom and strength to overrule in Lucia and by doing so not one inhouse hearing is constitutional as I thought it through. I've asked you to reimburse me as I've an ill wife that requires 100% of my time and I'm too ill to be a pro See. If I must file, even if I die doing it, I will before I die. I need repatriation of the litigation fund that the SEC person's referred to hearing above fraudulently induced me to spend..

5) Lastly Judge Murray ordered me to attend a hearing knowing that I can't live up to any schedule as it's the lawyer I get after I'm reimbursed for the damages the fraud your predecessors perpetrated against me schedule and not mine as I'm too ill, tired to continue as I've. and I will not let her bully me as my wife and my life come first! As it is her Judge James Grimes did a number on me. Now I know the fix is circular from, to and back to the commissioners. Let her get a new victim as this one is worn out and her Judge Feolak explained I'd be irreparably harmed if forced to testify and my health is 3 years older now!.

6) Since I've asked Judge Murray for the phone number to the conference if I do not get it this is my response. She must recuse herself as I'm going to shortly sue her and the entire group of fraudsters and she is at the top of the heap as she appointed 2 violators to my case and was violator herself unless she proves differently.

7) I hope to file next week but if it takes longer I want to go on record that there is no sense to her being involved and as a result of my illness and the motions I've made if not answered before I file you won't be able to say that I did not give you a chance to resolve this entire controversy. The article 2 disability was hid by the collusion and conspiracy. Let's not hide from my offer. Will you look ridiculous in a no asset case already spending one million on a witch hunt!? Now you want to spend more on a no asset case. How will our President ever save face when it's his own agency pulling this fraud against the American people and an innocent defendant no less? I feel like him, as it's a witch hunt and a collusion and conspiracy to gun me down!

Respectfully

Edward M Daspin Pro See [Not for long]

From: "edwardDaspin" <emdaspin2@optonline.net>
To: "Kolodny, Nathaniel" <kolodnyn@SEC.GOV>
Cc: "ALJ" <ALJ@SEC.GOV>, "Shields, Kathy Moore" <ShieldsK@SEC.GOV>, "McGrath, Kevin" <McGrathK@SEC.GOV>, "O'Connell, Barry" <OConnellB@SEC.GOV>
Date: 11/13/2018 08:42:00 AM
Subject: RE: Matter of Edward Daspin, AP File No. 3-16509

Dear Judge Murray,

I have received enforcement's' response and it lacks the RES of the matter! I am not a lawyer but i do know conflicts of interests. I will be filing a lawsuit in the Federal district court early next week. Mr Kolondny, Mc Grath, O Conell and Ms.. leslie Kazon, yourself and all the other adjls that colluded and conspired to: not disclose the infirmaries each of you had and that you continued assigning to cases and micro managing each and every case and they continued accepting cases knowing they were all violators of Article 2 proper appointment of the 2nd amendment of the Constitution, {I will not name Judge Feolak. If all of you chip in to payme the damages for the theft of my time of 4 years effort for a phony Judge who was an inferior officer so that when i previously called the travesty a FIX i was not far off the mark as in that capacity you and the other adjls had a fiduciary to the Commissioners under the Hon, Mary Joe White .They will be in the lawsuit as john and Jane Does as well. and if the court metes out the financial penalties to each of the actors i will indemnify Judge Feolaks' portion or pay it myself from the proceeds that flow from my portion of the theft of my time awards based on a jury trial. That comes to 8,000 hours at \$350.00 and hour is \$2,800,000.00.

In order to appear tomorrow i will need the time [10:30] and the phone number. I did receive a copy from Mr. McGrath but cant find it so please arrange an new email! thanks in advance.

Judge as you can s i do not intend that our nation not know what happened to me as its an object lesson that they need to know. Dodd Frank must be either repealed or sterilized and that was the point of my ombudsmen plan. Since i was the person my law firm requested a seal the file order for to Judge Grimes I want you to know that I do not want this file sealed as its anew day and a fresh start. I cannot approve any schedule until im represented and i cant get represented unless i receive the #1,000,000.00 that i was duped out of by the nondisclosure of material facts and information that had i known i would have acted earlier than i finally did. You judge cases for fraudulent inducement all the time as a mater of fact your colleagues at the enforcement division alleged i did not share my name in time and allege, contrary to the evidence i whit held it untill the check was drying contravened by their own Brady information. Judge you defrauded me with the adjls that conspired with enforcement and the commissioners under the Hon .Mary Joe White. You are out of line going anywhere near this case. You have an interest in finding me guilty so that you wont have to pay the damages. Why did you assign this case knowing that i have accused you of improprieties?? I now ask you to recuse yourself. You will be a named defendant in the federal district court action. I have no idea why enforcement did not accept an offer to assist this agency and settle this matter! They and you know its a no asset case! !??. So far our country has spent over \$1,000,000.00 and defrauded me out of the same .it is. Waste! and that is an understatement .Im sure our President will be very pleased to know this tragedy and he will. as we both suffer from a witch hunt and a collusion and conspiracy. You can change this.

Respectfully

Edward M Daspin Pro SEE

On Tue, Nov 06, 2018 at 03:07 PM, Kolodny, Nathaniel wrote:

Ms. Shields:

Attached for Chief Judge Murray's attention please find a courtesy copy of the Division of Enforcement's Response to Respondent Edward Daspin's October 30, 2018 Filing and Related Submissions, submitted in connection with the above-referenced matter. The Division served the Secretary's Office with the original and three copies of the attached via UPS overnight delivery and via facsimile, and requested that the filing be made under seal.

Thank you,

Nathaniel Kolodny

Nathaniel I. Kolodny | Senior Counsel
U.S. Securities and Exchange Commission
212-336-5104 | KolodnyN@sec.gov

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973-919-0070;EMDASPIN2@OPTONLINE.NET CASE3-16509 AT & 3-16509 9/13/18

TO: THE COMMISSIONERS & JUDGE MURRAY

DECLARATION OF E.M.DASPIN, MOTIONS AND PRAYER FOR RELIEF

MOTION TO ADJOURN JUDGE MURRAY'S CASE SCHEDULE UNTIL VACATE MOTION HEARD. IF DENIED THE MOTION BY THE COMMISSION FOR \$1 MILLION IN FEES' NEEDS TO BE HEARD FOR THE COMPENSATORY DAMAGES CAUSED BY THE COMMISSIONS ERROR NOT APPOINTING ADJLS UNDER ARTICLE 2; AND THEN A MOTION TO THE CIRCUIT COURT TO APPEAL ANY DENIALS OF MY MOTION[S] TO THE COMMISSION.

BELOW GENERAL TOPICS IN BRACKETS; MOTIONS, DECLARATION AND BRIEF AS WELL AS CERTIFICATE OF SERVICE IS CONTAINED HEREIN AND THIS MOTION FOR ADJOURNEMENT OF THE ADJL CASE UNTIL THE ABOVE IS HEARD AS WELL AS AN OUTLINE OF THE PROJECTED SAVINGS TO THE AGENCY AS A \$90 MILLION PER ANNUM SAVINGS, AND ELIMINATION OF 100 SEC INHOUSE DEFENDANTS' ATTRIBUTABLE TO THE SECS IMPLEMENTATION OF MY ACTION PLAN AND REQUEST OF A 15% WHISTLBLOWER FEE:

[Motion for return of 2300 Bates documents; and extend any action until I am given the restoration of the one million dollars insurance I wasted in my wasted defense; motion to adjourn any case activity until the commission rules on the vacate motion, the damages for theft of my time motion; or a consulting contract gave me if motion to vacate before the Commissioners' is not heard; and if the Commissioners' do not respond prior to judge Murray's deadline of case commencement [unless adjourned] by Judge Murray, if commission won't take that PART of my motion to provide me the defense fees'. I will then request that the court grant me the time I need to be heard by a federal circuit court as without a law firm I cannot defend myself due to [REDACTED]

[REDACTED], [REDACTED] [2 goldens] [REDACTED]
[REDACTED]

[REDACTED] FIELDS COMPLETELY INNOCENT OF THE BOGUS COMPLAINTS ALLEGATIONS AS SPECIFICALLY DESCRIBED IN THE SUBMISSIONS I COPIED JUDGE MURRAY ON TO THE COMMISSIONERS' INCLUDING THIS ONE. IF THE MOTIONS I SUBMITTED TO THE COMMISSION ARE DENIED]

Dear MR FIELD & Ms. Schield ;

I declare under the penalty and under the constitution that the below declared facts are true; under the laws of the United States. I understand that if any facts stated by me below are purposely false and that I am subject to punishment. Any allegations spoken below are on information and belief and not stated as fact, as referenced therein [OIB]].

1) I have been served by an order made by the Honorable Brenda Murray, chief judge of the inhouse court as well as an order by the Commissioners with respect to the supreme courts' notice as in DeLucia.

2) I have written to both the above persons and asked them to combine their efforts, at their sole option and to advise me of what portion[s] of the motion[s] I have made each will play, in what order played and further that any orders with respect to the above be given sequentially to enable me the time to respond to the Commissioners' first and then Judge Murray second. I ask that this be followed as my time is limited by the new duties my wives' illness imposes and demands' on me and because I do not want to be defaulted by either of the above persons

3) Please indicate by order, letter or otherwise exactly how the motions I've made collectively and individually, will be handled and allowing me time to respond and to lengthen the time for response by me until my time permits me to answer, albeit on a delayed reaction time so that I'm there, with and for her as mandated by her illness. Such delays that I'm anticipating and apologizing up front. It cannot be avoided by me, as if they could, I WOULD NOT BE LATE. I apologize up front for any such delays and ask for your understanding. and that either of you will not default me for such if and when it occurs.

3) At the same time I also ask for a final order by you, with respect to the motion[s] that I have asked either or both of you to respond to. I cannot be held responsible for delays and I respectfully ask that you understand that my request is not one prompted by any strategic litigation plan as I do not want delays; as such will plague my wives' application to refinance her home.

4) Absent enforcements' theft of my time and the concurrent civil rights violation, by prosecution of a made up and disingenuous WELLS letter allegations', [which they knew excluded material facts; which had no omissions' been made, they themselves would have eliminated the WELLS allegations' for cause; because the exculpatory evidence they had in their possession, and which they purposely withheld prior to the Wells submission demonstrated no need for a Wells letter, let alone initiation of a complaint!

5) The illegitimate Wells letter induced the Commissioners' to effectuate the complaint's initiation which also omitted the same material facts as the Wells; that theft violated my civil rights'; in so taking that asset of value and the commission, at its option, can retroactively provide me as a whistleblower against the purported benefits society gains use of any portion of the times byproduct, the plan, and in addition to the cost of \$2,800,000.00 for the approximate 8000 hours of my time as well as a whistleblower performance bonus of 25% of the savings that the plan generated and which was discounted by me to 15%; of the savings the SEC generates thru elimination of approximately 100 would be inhouse defendants per year out of 100, randomly selected by the commissioners' average monthly inhouse determined by enforcement; if a complaint is initiated at the rate of 10 cases a month, of which I project that 2/3 a month will be either not initiated [A no bill] after CBI reviews the 10 cases in confidence and with the consent of the potential defendants' law firm, and which CBI will implement its plan on the Commission selected cases reserved by enforcement for inhouse if a case is ordered by the Commission and within 30 days', a CBI commission report for an estimated 2-3 potential defendants'; which CBI believes that from the 12 a month given 1-1.25 will receive NO BILL [10%] BY THE COMMISSIONERS; .5—1.25 will result in a non guilty bench trial hearing of 2 no bill and or innocent out of 12 given for CBI's initiative and with 10 given a complaint of which the enforcement results during 2013-2015 find 10% innocent and with the CBI initiative another 17.5% in total.

The additional 17.5% found guilty added to the current inhouse innocence of 10% will give the inhouse CBI Innocent persons 27.5% which is on a par with the federal district courts Sec averages for the 3 years ending 2015 by the wsj!

6)[If the test on 20% of enforcements Wells finding for the first 6 months with the retired judge given another 90 day for his results to be added to the projected supports the projection than the estimated savings using 4 teams instead of the test using myself, a lawyer and secretary and computer assignment Secretary [Ms.] Shields. The person tasked with the over all operations of administration when the plan results prove out[no guarantees intended and/or implied], than should result in a gain of 17.5% more innocent would be defendants' than are currently being found guilty and with of the 500 annual in house defendants'; should reduce 87 persons a year from judged guilty than before the plans implementation and the cost of the plan, assuming the average defendant's cost of the agency is \$1,000,000.00 and the CBI initiative for the 100 cases going thru it is \$70,000.00 a person[of the 20% judged as having a CBI NOBILL LETTER[100 OF THE 500 CASES REVEIUED BY CBI RESULTING IN A 20% RECOMENDATION IT IS BELEIVED, that's a savings of \$930,000.00 a person and with 13 -25 cases judged guilty out of the 100 cases CBI found a preliminary NO BILL for.[as the commission is projected to grant a no bill outright on 10% and a bench 90 day hearing on 10% of which between 15-25% will be found guilty! The CBI initiatives cost of a straight no bill is \$32,000.00 allocating all of CBIS time to the 20% [100 cases for a no bill]and not charging any costs to the review of the 500 cases from whence the 20% were selected. On an allocation of 60% of the 4 teams cost for a review of the 500 case and a comprehensive report by each team of the 20%[100 persons] thought innocent then the report costs \$12,000.00 a case and the review of all the cases adds an additional \$20,000.00 per case for all cases.

7) That effort provides great value because it ultimately sets 17.5 of the 500 "would be wellse recommendations" FREE! assuming half[50 cases]it goes to a bench trial by a retired federal/state court judge that cost is \$48,000.00 additional as the judge is \$500.00 an hour and the stenographer is \$200.00e an hour incrementally).All overhead costs for the bench trial are included in CBIS' budget as segregatione from enforcement is mandatory .So that there are no undue influences' and this reduction in the budgete of the SEC in house agency can be offset by the enforcement bringing an additional 100 "would be guiltye persons" reserved for inhouse and or assigning to the Adjl. 60% of the projected 1,000 cases a yeare while prosecuting 400 cases in federal district court .Enforcement will continue to require it fulle enforcement team . in addition CBI cost provide a second look by 4 CBI dealmaker and a lawyer and ae lawyer and secretary so that the agency is giving each and every would be defendant the potientiale benefit of the doubt before any case is assigned to an Adjl. With that said an additional 100 cases cane be given to the ADJLS' to substitute the and 87 more found innocent and the projected deletion frome the 600 of those amount of 120 cases as CBI has the firepower to review 600 cases a year and take 120e for no bill/bench trials, based on the Commissions direction with enforcements' recommendation'se already in the Wells submission; and with each case given CBI having the draft complaint, the brady thee hard evidence to support the allegations' . Assuming that the CBI 4 teams' review 600 cases[30 per yeare per 3man/woman team]] and reports on each with 20%[+/_]a full report recommending a no Bill; ofe which the commission grants half [60]as being correct and 60 for bench]from the 120 cases.e

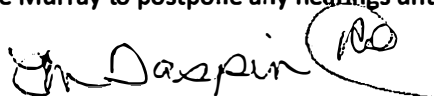
8)Going back to my case I have asked the Commission by motion to grant me a reimbursement of thee One Million I lost in insurable coverage if the Commission believe this case should proceed. The basis ise very strong as this defendant's litigation fund was wasted attributable to the Commissions error and note this defendant. In addition to my claim as above stated as well as my strategic litigation plan. Mye company paid for the Insurance aif not vacated I need the defense. The pace inhouse is to fast for me toe keep up. I therefore need a law firm especially with Joan getting worse ech month and requiring moree time . Her sleep walking gets me up at night causing e no sleep some lights and so i must slap during thee

day when that happens while keeping one eye open for her. I need a special calendar that is more flexible even when I get a lawyer At 80 and not well myself I cant keep up with the stress as its personal .If I get tht whistleblower contract ill be able to afford a live in an can donate full time tommy strategic plan.

9)As a result I ask for postponement until the Commission decides my motions' .If the Commission does not want to pay for the value of the theft that enforcement stole from me than I will ask for final order so I can appeal to arrive t meaningful review on the money and on the damages and violation of my rights by theft of my time. If they vacate than there are no issues for Judge Murray.

Therefore I ask Judge Murray to postpone any hearings until the Commission rules.

Respectfully



E M Daspin Pro SEE

CERTIFICATE OF SERVICE ON 9/14/18 I SERVICED UPS TO REMIT THIS SERVICE EDWARD M DASPIN-----

THE PRESIDENT OF THE UNITED STATES. THE HONORABLE DONALD J TRUMP

THE VICE PRESIDENT OF THE UNITED STATES THE HONORABLE MICHAEL PENCE

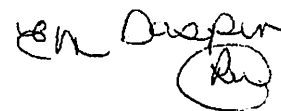
THE HONORABLE SPEAKER OF THE HOUSE, PAUL RYAN

MR FIELD OR THE COMMISSIONERS (3 COPIES)

MS SHIELDS (1 COPY FOR THE JUDGE BRENDA MURRAY;

THE HONORABLE JAMES GRIMES, THE HONORABLE CAROL FEOLAK

MR MCGRATH, MR KOLODNY, MR O'CONNELL, MR SHAPANKA, MR AGOSITINI, MR LUX, MR L CHESTER
MAY FOR MKMA & ME FOR CBI, MR LUIGI AGOSTINI (CORPORATE STAFF, MR GARY KRENSEL
CORPORATE STAFF)

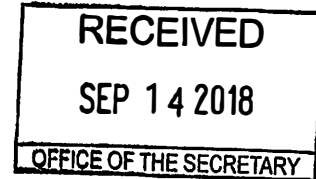


Edward M Daspin ,Pro See

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Case# 3-16509At 3-16509



Proposed order[s]for summary disposition or settlements', as the Commissioners may so decide; attributable to 'and in consideration for the taking of my consultants time and use of my time gained by exclusion of other activities, caused by the sole actions and inaction and omissions of material facts and other harm which this defendant suffered as specifically disclose in all my submissions to the Commission an which form a permanent record of the enforcement divisions willful omissions' of material facts' ,not made in the WELLS letter; and as such omissions' of material facts also induced in the complaint so initiated and which further resulted in the taking and theft of my time, as well as the strategic plan which the time taken went to further the interests of the SEC,.

The aforementioned may provide the Commissioners,' with a dramatic reduction of the time they and the Adjil[s] regularly used to adjudicate the complaints' initiated by The Wells submissions' absent the Ombudsmens ' plans enactment.[The PLAN];and prior to initiation of a law suit by the SEC, which is very costly and which time might be better spent on the enforcement of violations of securities laws that have better prospects than those that the Commission may initiate a NO BILL, on ;as a result of the PLANS implementation

In addition the plan would save the reputations' of would be defendant' s who were found by the Commission and based, in part, on CBIS Plan services .It is estimated , with no guarantees intended and/ or implied that a 20% reduction of the cases that would result in a SEC In house complaint may be saved [approximately 100 cases] freeing up the Commissioners valuable time for the best prospects' for best recovery's' and the elimination of enforcements precious s time! In my case i estimate they spent over \$1,500,000.00 of time on defendants; they knew up front ,from financial statement review that they subpoenaed prior to the WELLS submissions were tapped out; and they knew that there could never be a recovery for that reason ;as well as for the clear and present danger they were submitting our country to and this Commission and the Adjil. There can be no excuse for such theft of all of our time,!

Our President would get very upset upon seeing this waste of recourses just to provide divisional enforcement prosecutors and investigative arm's on the frivolous pursuit against defendants they knew were innocent and judgement proof to boot just because I had a felony 45years ago an because Ms. Puccio ,representing the Mc Farlane Enterprise ,colluded and conspired in the dishonest shareholder's meeting SEE pg17; L20;L25 wherein she admits the power and WMMA control is in WMMAS' board of directors' hands confirming Mr. LUXS truthful deposition that he and the board resolutions' controlled WMMA not me!!.Yet the gross injustice to steal my time and worse the Commissioners' and the adjils time is despicable. Some Quality control must be introduce to break up the inevitable employee relationships that fee on any organization and produce abuses of epic proportions' . If we save 100 defendants and the reputation of our Commissioners and Adjil then its possible DODD FRANK might be saved a may be proven by the results of the fix iv'e come up with and the application of dealmaker's street smarts. Here your prosecutors believed the Bs' a crying whistleblower tolled them, then they found out they did not have the courage to admit the mistake to their boss or got their boss to cover for them If you dont find out yoll NO never know how to stop similar events! strength to drop it and kept it .

going to the disadvantage of all of us. No guts! They are not dealmakers only young turn lawyers who learn at our mutual expense. Not In this deal That is what enforcement did not have. Had they just read 4 documents we would not be here . My wife was throw out of fidelity the moment the SEC subpoenas hit and after the Supreme courts' decision and because this travesty could go on infinitum; I cant produce my statement without disclosure of a law suit them makes untrue allegations that destroy my wifes' refinance attempts'! I cannot express the harm we have incurred ,[yet the little enforcement litigation tiger teams];with their smooth youthful skin and beautiful smiles make us love them; but not when they peruse innocents! Now they finally appears repentant nd possibly the head of the enforcement division saw the manifest and patent injustice they have done to all of us an gave them the word to STOP IT!

At least I hope, but he cant' control the enforcement teams', as by interceding he demoralizes the little tigers morale and esprete décor..Thats " ' why a lesson learned by the Commission making restitution for the theft which also eliminates claims against their flock ,will serve as a lesson that the commission backs its people onetime; but a second violation will result in more aggressive action and let them think about that veiled threat.

You must warn them that this is once& enough! Make a lesson to them financially, promotion wise for year ,Had we not come up with a resolution they would be defendants to me, in federal district court in New Jersey and from there the US attorney who will not be the friend of errant prosecutors that abused their fiduciary, joined the Mc farlane enterprise, knowing that Mc farlanes' enterprise members committed more than 2 predicate acts against WMMA it the space of 10 years and that the prosecution facilitated the Enterprises ongoing theft to steal its promoters, strategic plan, at the same time, these Prosecutors made a case by artifice and fraudulent inducement of the Commissioner's' and judges they were to serve, inducing them to aid an abet their crimes of violating my civil rights and aiding and abetting the Prosecutors', Inadvertently to cause a manifest patent injustice against me !

I hear with submit a draft Order Ex A, created to reimburse me and CBI for the product which we created with the time taken away from other projects and which I believe is very important to provide the enforcement division monitoring as an aid to its head , the commissioners and aid to try to reduce case load and the lawsuit initiation that this PLAN will reduce when Implemented by a CBI teams focus .Its implementation in, EX A, The cash out order is left to the Commissioners and agency for which it serves and

EXB, the order that envisions CBIS participation in finishing the plan with the input of the Commissioner' enforcement , and the Chief Judge ,The HON. Brenda Murray, whom I now understand the conundrum and want to help her from not sting her energy and those of the adjls innocent would be defendants' and of defendants whose financial recourse we would pre investigate to insure that the public gets a pot of gold at the end of the rainbow and **not lead**. Lets 'give you to operate this agency as a business man and or woman would, with an internal IIR based on the heavy hitters and let the 50/50 be handled by the retired Judges that CBI will introduce; with the enforcement and Commissioners blessing, so that those cases go in60 days instead of 24months.That will bring your average down to one year; which was congress intention when it enacted DODD Frank. It will works if you let CBI; run it than DODD Frank might work and the SEC will be a profit center which under a non coerced settlement, becomes the true test. If we have to make money by suing innocents' and or persons that can't rub two dimes together where are we going ?Its not what the SEC was set up to do. Bring actions against wrong doers, eliminate

faulty lawsuits that harm innocents by the PLANs outside implementation so when it reports that so and so had submitted 4 iffy deals that No BILLS were made, then the enforcement head gets the message Right now the Tigers bring in cases from insolvent and/ or innocent defendants' and its 3 years' before the head of enforcement knows he was tricked.

!What good does that do for his batting average.

I do not believe that the Plan should be implemented in house for the same reasons that the in house Plan implementation will be stalled by the interrelationships that created the injustice. Its' too close and deserves constant monitoring & support which ,in and of itself ,also protects' our Commissioners' and Judges from complaint's lodged that they were ineffective leaders, did not set up a system of checks and balances' in such a delicate situation as securities fraud !! nd sued the wrong people or those that were broke that could have been had gone away in 90 days instead of 2years!.The trick is more good cases out the door.

CBI will run a filtering system which in and of itself should eliminate 20%of the cases which give the machine more good inventory to find fraud against; instead of against our little tigers ,We can protect them from themselves and by so doing make them proud again This case they must shudder and get bristles down their spine and say not me!!That s' is the only part of what happened that gives the Commissioners a great object lesson to give its employees while demonstrating it may support those that made one error but not two in any 3year period.!

I added the two other defendants for vacating their settlements. They were just as innocent as I was. It would not be just to harm their respective reputations . There was no wrong doing her only in the minds of the Tigers that wanted a case so bad they would lie for it ;expose those they serve for it and Give the defendants whose innocence is attested to by exhibit review.If the submissions require change fine please do it.If you don't want ths to end O will then submit the additional orders you may request.

I hope we can resolve these issues

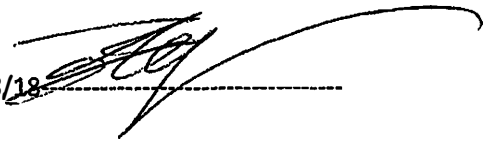


Please vacate their respective settlements,

Respectfully

EDWARD M Daspin

Certificate of service attached and sworn that I enclosed this order on 9/8/18



EDWARD M DASPIN PRO SEE

4pinveiw lane , Boonton,N.J.07005 Ine,Boonton,N.J,07005

973-919-0070; emdaspin2@optonline.net

9/8/2018

Re: case #3-16509AT S.E.C VS EDWARD M DASPINET AL

ORDER

By order of the Commission of the Securities and Exchange Commission:

WE Hereby vacate the complaint made in the above captioned matter

For good cause showing this commission also orders a judgement to Edward M Daspin and CBI INC;

IN THE AMOUNT OF \$2,800,000.00 ;IN EXCHANGE FOR THEIR PROVIDING 4 YEARS OF HIS/ITS EFFORTS', AT ITS STANDARD HOURLY RATE OF \$350.00 PER HOUR AS STATED IN ITS' STANDARD CONTRACT @2,000 HOURS' PER YEAR ,SPENT AS PROVIDED TO THIS AGENCY, OUT OF 80% OF 5 YEARS' EFFORTS' ENDING ON THE DATE OF THIS AWARD; AND FOR THE VALUE IT AND HE HAVE SUBMITTED ,TO THIS AGENCY ;,

THIS SUMMARY DISPOSITION JUDGEMENT SHALL BE PAID WITHIN 10 DAYS FROM THE DATE OF THIS FINAL ORDER; TO THE ABOVE ADDRESS MADE OUT TO CBI INC AND EDWARD M DASPIN AND THEY, INDIVIDUALLY AND COLLECTIVLY HEARWITH GIVE UP ANY RIGHTS' TITLE AND INTERESTS' TO AND/OR THE WORK PRODUCT HE AND THEY PARTICIPATED IN CONSTRUCTING FOR THIS AGENCY TO DATE.

BY THIS PAYMENT THEY EACH WAIVE ANY RIGHTS' TO ANY CLAIMS' AND/ OR CAUSES OF ACTION EITHER OF THEM MAY HAVE HAD WITH RESPECT TO THE COMPLAINT AS ABOVE STATED AND FOR THE AGENCYS 'INDIVIDUAL, OFFICERS', EMPLOYEES AND /OR JUDGES IN THE ABOVE CAPTIONED MATTER

IT IS ALSO ORDERED THAT THE SETTLEMENTS BETWEEN MRLUIGI AGOSTINI AND MR LAWRENCE LUX;FOR GOOD CAUSE SHOWN ;THAT THE SETTLEMENTS EITHERO HEM SIGNED WITH THE AGENCY IS HEARBY VACATED AN FULL RESTITUION MADE WITHIN 10 DAYS OF THIS ORDER DATE; THE RESPECTIVE SETTLEMENTS' BETWEEN EITHER OF THEM MAND THIS AGENCY ARE DECLARED NULL AND VOID; AND THEIR NAMES SHALL BE REMOVED BY THIS AGENCY AS DEFENDANTS' AND ANY FINES ANDOR FINANCIAL CONSIDERATIONS EITHER MAY HAVE PAID THE AGENCY,SHALL BE RETURNED AND EACH WAIVES' THEIR RESPECTIVE RIGHT TITLE AND INTERESTS' TO ANY CLAIMS, AND /OR CAUSES OF ACTION EITHER MAY HAVE HAD AGAINST THE AGENCY AND ITS THEN APPOINTED EMPLOYEES AND JUDGE BY THEIR BELOW SIGNATURE[S]:

DATE/

THE SECURITY AND EXCHANGE COMMISSION BY ITS COMMISSIONERS.

AGREED : LUIGI AGOSTINI-----;LAWRENCE LUX-----

EDWAR M DASPIN & CBI INC.

EDWARD M DASPIN PRO SEE

4plnveiw laneę Boonton,N.J.07005 Ine,Boonton,N.J,07005

973-919-0070; emdaspin2@optonline.nete

9/8/2018

Re: case #3-16509AT S.E.C VS EDWARD M DASPIN ET AL

ORDER 2

By order of the Commission of the Securities and Exchange Commission:

WE Hereby vacate the complaint made in the above captioned matter

For good cause showing this commission also orders that Edward M Daspin and CBI INC are retained by this commission for a period of one year, renewable at the option of this agency; to offer tis commission a turn key system , after due consideration with this agency and each of its divisions as well as with the chief administrative law judge, Judge Brenda Murray, and the head of the enforcement division Mr.

-----;and for each's " advice and consent to the proposed Strategic ombudsmen's' plan to define and include in places that CBI agrees with; and to inculcate those comments each division and or Judge made in writing to CBI in connection therewith. with respect to the ombudsmen plans' proposed operations and as may be amended and compiled by CBI if acceptable to CBI. In accordance with those written protocols ' and construct of the ombudsmen's planned operations' and communication with this commission and each of the divisions' and or chief judges. comments. Each of the aforementioned shall supply CBI with their entire written , mission ,function protocols ' and operational plans which shall include communication with the division and judge Murray, and if acceptable to CBI ,at its sole discretion, and with the commissions' approval the plan shall then be submitted to this commission by CBI and the division and chief judge, no later than December 31,2018 .With It' CBIS' submission it shall include a commentary of each issue that the parties could not agree upon; so that this commission shall make its preliminary final decision by the 2/10/19 and submit it to the parties at that time ,so that at a proposed meeting by the Commission and the parties, at the commissions' headquarters,' it can be discussed and any open Issues defended and be opened for any discussion . The commission shall rule on the entire write up by February, 19,2019 [Mr. Daspins' Birthday]on March 1,2019.

THAT SUBMISSION OF THE COMMISSIONS' PLAN WILL REPRESENT THE ENTIRE PLAN THIS COMMISSION HAS CONSTRUCTED FOR LEGAL APPROVAL AND OTHER CONSENTS' WHICH MAY BE REQUIRED BY THE EXECUTIVE BRANCHS'APPROVAL,,AND TO STAFF ITSELF ,(CBI),WITH 5 ADDITIONAL TEAMS OF A DEALMAKER& LEGAL SECRETARY; AND WHICH EACH TEAM REPORTING TO A LAWYER TO REPRESENT CBIS INTERCOMMUNICATIONS WITH THE SEC DIVISIONS' AND OR JUDGES,ALL IN A CONFIDENTIAL OATH BY AL LCBI OPERTIVES AND LEGAL SECRATATERIES . ANY OTHER CONSIDERATIONS' MADE AND WHICH WE HOPE WILL BE FORTHCOMING BY APRIL 1,2019 .AT THAT TIME THE COMMISSION WILL EITHER RETAIN CBI, FORAN ADDITIONAL 3 YEARS ,TO SERVE AS THE OMBUDSMEN FOR ALL INHOUSE SUBMISSIONS'WITH APROPOSED RAMP UP TIME SET UPONPAYMENT TO CBI OF EACH TEAMS PRORATE BILLING FOR HALF OF THE THE REMAINING FEE[,\$1,400,000.00 FOR,EACH TEAM[TOTAL OF 6 TEAMS'AND A CORPORATE LAWYER FOR EACH TEAM;TOTAL FOR THE FIRST 6MONTHS OF \$8,400,000.00] AND THE 2ND HALFS PAYMENT OF THE SAME AMOUNT AFTER THE TEAMS FIRST 6MONTHS HAVE BEEN USED TO RAMP UP AND START PODUCTION OF THE WELLS REPORTS OVERSIGHT

ETA

Commented [44]:
Commented [44]:

ENB

WITHIN 30 DAYS OF CBIS RECEIPT OF THE REQUIRED DISCLOSE DOCUMENTS FOR EACH CASE TO BE ASSIGNED IN HOUSE; AND PRIOR TO DEFENDANTS SUBMISSION OF ITS WELLS' ALL EXCULPATORY INFORMATION, BRADY DISCLOSURES AND DRAFT COMPLAINT AND SUCH EXHIBITS ON FILE, WITHOUT RESERVATION, SHALL ACCOMPANY THE COMMENCEMENT OF ENFORCEMENTS' WELLS SUBMISSION GIVEN CBI [AT] THE TIME IT PRESENTS ITS WELLS TO THE COMMISSIONERS', AND SHALL BE RESPONSIBLE TO SEND THE TEAM LEADER, THE DEFENDANTS' WELLS AT TIME OF SUBMISSION

. THE RAMP UP SHOULD TAKE 3 MONTHS AND ANY PAYMENT FOR A TEAM THAT HAS NOT YET BEEN INITIATED INTO CBI AS A 3 PERSON TEAM, THE DEALMAKER, THE LEGAL SECRETARY AND THE LEGAL CORPORATE LAWYER. WILL RESULT IN A CREDIT AGAINST THE PREPAYMENT AT THE END OF THE FIRST 6 MONTHS, CBI INTENDS TO RECRUIT EACH TEAM AT COMMENCEMENT ITS FIRST 6 MONTHS PAYMENT TO GATHER THE RESOURCES AND PREPARE THE SOP WITH THE DIVISION . IF THE COMMISSION DOES NOT DESIRE CBI TO IMPLEMENT THE TEAMS ADVOCACY ; THEN AT APRIL FIRST, 2019, OR EARLIER AT THE COMMISSIONERS SOLE OPTION THE REMAINING ASSIGNMENT WILL CEASE AND CBI WILL RECEIVE THE REMAINING \$1,400,000.00 AND ITS ASSIGNMENT WILL BE COMPLETED .

This will be , subject to all the parties required for CBIS' plans' and its operational standard operating and communicating procedures. [SOP]. And to prepare for initiation of its' Strategic business plan interests and finalization. Upon CBIS receipt ; while it is constructing its' own protocol's , mission statement and independent ; but interrelated, ombudsman's plan [the plan]; the Judge and the enforcement division will provide CBI with their own protocol as if they were designing the SOP of CBI. In this manner CBI will inculcate any and or all recommendations that improve the operations of its strategic plan. If there is a dispute they each may have with respect thereto and provided each provides CBI with a rewritten schematic and verbal operational plan that should as if and when implemented eliminate any discontent of the parties and with the understanding that neither enforcement and or the Judge would have any control of CBIS initiative, as an advocate of those would be defendants cases' that CBI, at its sole option , pass on making a report , if its review demonstrates after defendants WELLS reply that enforcements take on the case was correct and has nothing to contribute which case file would be returned as a no comment . If after one year of instituting the strategic plan it is found that enforcement's initiation does not provide CBI with at least 15% of the cases the commission belief CBIS contribution was successful; resulting either in NO BILL, or a hearing held confidentially by a retired judge; than the plan will be discontinued and a 6 month break fee, will be paid at that time less any prepayment for months where no service was provided.

THIS SUMMARY DISPOSITION JUDGEMENT SHALL BE PAID ,50% (\$1,400,000.00) WITHIN 10 DAYS FROM THE DATE OF THIS FINAL ORDER; TO THE ABOVE ADDRESS MADE OUT TO CBI INC AND EDWARD M DASPIN AND THEY, INDIVIDUALLY AND COLLECTIVELY HEAR WITH GIVE UP ANY RIGHTS' TITLE AND INTERESTS' TO AND/OR THE WORK PRODUCT HE AND THEY PARTICIPATED IN CONSTRUCTING FOR THIS AGENCY TO DATE. WITH THE REMAINING BALANCE PAID ON MAY 1, 2019 IF THE COMMISSION DOES NOT WANT TO RETAIN CBI FOR IMPLEMENTATION OF THE OMBUDSMEN'S PLAN OR IF IT DECIDES TO MOVE FORWARD WITH CBI AND THEN THE REMAINING BALANCE WILL BE PAID AT THE TIME THAT CBI FIRST COMMENCES TO BRING ON , IT COMPLETED 3 MAN/WOMAN TEAM, AS DISCUSSED HERIN AND ABOVE. AND WHICH MR DASPIN'S TEAM WILL BE FIRST TO START; ' ONCE A CORPORATE LAWYER AND LEGAL SECRETARY ARE APPOINTED FULL TIME POSITIONS AS CBI EMPLOYEES AND/ OR SUB CONTRACTORS AND AT THE TIME \$1,400,000.00 WILL BE PAID AND FOR EVERY HALF YEAR THE REMAINING \$1,400,000.00 FOR THE TEAMS PRODUCTIVITY UNTIL ALL 6 TEAMS ARE IN FULL FORCE AND EFFECT .

Ex B

BY THIS PAYMENT THEY EACH WAIVE ANY RIGHTS' TO ANY CLAIMS' AND/ OR CAUSES OF ACTION EITHER OF THEM MAY HAVE HAD WITH RESPECT TO THE COMPLAINT AS ABOVE STATED AND FOR THE AGENCY'S 'INDIVIDUAL, OFFICERS', EMPLOYEES AND /OR JUDGES IN THE ABOVE CAPTIONED MATTER

IT IS ALSO ORDERED THAT THE SETTLEMENTS' BETWEEN MR LUIGI AGOSTINI AND MR LAWRENCE LUX; FOR GOOD CAUSE SHOWN ; THAT THE SETTLEMENTS EITHER OF THEM SIGNED WITH THE AGENCY IS HEARBY VACATED AN FULL RESTITUION OF ANY AMOUNTS MR AGOSTINI MADE PAID WITHIN 10 DAYS OF THIS ORDER DATE; THE RESPECTIVE SETTLEMENTS' BETWEEN EITHER OF THEM AND THIS AGENCY ARE DECLARED NULL AND VOID; AND THEIR NAMES SHALL BE REMOVED BY THIS AGENCY AS DEFENDANTS' AND ANY FINES AND OR FINANCIAL CONSIDERATIONS EITHER MAY HAVE PAID THE AGENCY, SHALL BE RETURNED AND EACH WAIVES' THEIR RESPECTIVE RIGHT TITLE AND INTERESTS' TO ANY CLAIMS, AND /OR CAUSES OF ACTION EITHER MAY HAVE HAD AGAINST THE AGENCY AND ITS THEN APPOINTED EMPLOYEES AND JUDGE[S] BY THEIR BELOW SIGNATURE[S]:

DATE/

THE SECURITY AND EXCHANGE COMMISSION BY ITS COMMISSIONERS.

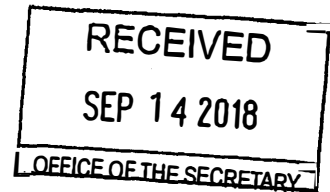
AGREED: LUIGI AGOSTINI----- ; LAWRENCE LUX-----
EDWARD M DASPIN & CBI INC.----- (4125) EBY

1

EDWARD M DASPIN PRO SEE

4 PINEVEIW LNE, BOONTON, N.J.;07005D

973-919-0070, EMDASPIN2@OPTONLINE.NET



9/13/18

CASE3-16509 AT

THE COMMISSIONERS'

DECLARATION OF EDWARD M DASPIN

Request for \$2,800,000.00 and 15% of the savings the plans implementation for 5

Years under the whistleblower that I respectfully request the form.

DEAR MR. FIELD;

I declare under the laws of the United States that the following statements by me are true, represent the whole truth and nothing but the truth. I know if the statements are willfully false that I will be subject to punishment.

1] I have recently filed a motion for summary disposition and /or a judgement; to be issued to me from the securities and exchange commission ; to either pay me for the time taken and defrauded from me ,and to put the agency in a position to financially damage me ;by and thru enforcements 'inflicting on me and my family, harm.

2] Both financial, emotional and reputational HARM by enforcement divisions' first taking and stealing my precious time by convincing and defrauding this commission to believe that the WELLS' submission enforcement had introduced contained the truth and nothing ; but the truth. When instead, enforcement knew that the WELLS they had submitted contained no truth, rather enforcement had omitted material facts' knowingly ; and with malice of forethought, and in their instead inserted false allegations', that they knew was false, as the exculpatory evidence referred herein below was known to enforcement before any Wells submission.

3] THE COMMISSION, BASED ON THE DREAMPT UP WELLS SUBMISSION INITIATED AN ACTION WHICH WAS NOT ONLY DEVOID OF THE TRUTH; BUT WHICH CONTAINED THE FALSE AND MADEUP ALLEGATIONS' MIRRORED IN THE WELLS LIE; AND SO THE COMPLAINT REPLICATED AND ENLARGED THE WELLS'

4] ENFORCEMENTS' LIE WAS PROPAGATED IN THE COMPLAINT AND AT THE SAME TIME OMMITTED ALL THE MATERIAL FACTS THAT ENFORCEMENT HAD IN ITS' POSSESSION. AS A RESULT ENFORCEMENT SUBMITTED AS A COMPLAINT AGAINST THREE [3] DEFENDANTS' WITH THE ASCERTION THAT I WAS THE RING LEADER, THAT I WAS THE CONTROL PERSON,, THAT MY SOLE PERPOSE IN FORMING THAT WMMA CORPORATION, WAS FOR IT TO SERVE AS MY UNDISCLOSED MONEY TREE AND PIGGY BANK; ALLEGING THAT THE BOOKS' MS BAIR AUDITED OMMITTED THE CBI/JOAN DASPIN LOANS, STARTUP CAPITAL AND MKMA SUBORDINATED FEES; WHICH WAS THE SIDE OF THE BALANCE SHEET PURPOSLY OMMITTED BY ENFORCEMENT TO DISUISE THE FACT AND MAKE IT APPEAR THAT ONLY OUTGOING EXPENSES TO DASPIN RELATED ENTITIES FULLFILLED THE OBJECTIVES ALLEGED TO PROVE MY MILKING OF ASSETS WHEN THEY KNEW SUCH WAS NOT THE CASE; THAT THE WMMA/CBI/MKMA SERVICE CONTRACT

PROVED THAT THE REVERSE OF THE COMPLAINTS' ALLEGATIONS' WAS TRUE; THAT THE LUX DEPOSITION ENFORCEMENT HAD BEFORE THE WELLS SUBMISSIONS' AND THE DISHONEST SHAREHOLDER MEETING PAGE ,17-L20-L25 ,SUPPORTING THAT THE WMMA BOARD RESOLUTIONS' AND MR LUX CONTROLLED WMMA AND NOT ME!; JUST AS MR NWUGUGUS' C HARTIS INSURANCE CLAIM WHICH I SENT TO ENFORCEMENT BEFORE ANY WELLS SUBMISSION PROVES, HE AND NOT I, WROTE ALL WMMA PPMS, NOT ME [AS PLED BY ENFORCEMENT]; JUST AS ALL WMMA EMPLOYEMENT CONTRACTS' AND THE WMMA/CBI/MKMA SERVICE CONTRACT PROVE NEITHER I, AND /OR MKMA COULD BIND WMMA AND THAT 100% OF ALL WMMA EMPLOYEES REPORTED TO WMMA'S PRESIDENT [MR MAIN] AND ITS CEO [MR LUX] NOT ME! ; JUST AS MY FEE FORGAVE WMMA OF ONE [\$1] MILLION DOLLARS OF THE IMC FEE; JUST AS THAT FEE FORGIVENESS REPORTED IN THE WMMA PPM [IN THE RELATED PARTY SECTION WHICH ENFORCEMENT HAD PRIOR TO THE WELLS 'LETTER SUBMISSION TO THIS COMMISSION] PROVED THAT THE NET OF \$240,000.00 I RECEIVED AFTER [DEDUCTING THE LOANS, THE START UP CAPITAL, THE TRAVEL EXPENSES AUTHORIZED BY THE WMMA DIRECTORS FOR THE WMMA OFFICERS AND DIRECTORS AND CONSULTANTS INTERNATIONAL TRIPS'] WAS FOUR [4] TIMES LESS AND THAT THAT FEE PAID WAS OVER 9 [NINE] TIMES LESS THAN THE MONEY I NEVER RECEIVED OF SUBORDINATION OF OVER \$2,2 MILLION OF FEES THAT I WOULD HAVE RECEIVED A PORTION OF ; PROVE THAT I CAPITALIZED WMMA WITH 9 TIMES MORE THAN THE PITTANCE I RECEIVED. [THE SAME \$240,000.00 AS HEIRIN BEFORE REFERED TO '.

ENFORCEMENT KNEW IT BEFORE THE WELLS SUBMISSION. THE STRATEGIC PLAN AND WHISTLEBLOWER CLAIM DERIVED BY ME TO SEEK THE HIGHER GROUND THAT THIS COMMISSION SHOULD STRIVE FOR ; AND TO DRAHEATACALLY REDUCE THE COMPLAINTS' AGAINST OTHER KNOWINGLY INNOCENT DEFENDANTS' WHILE AT THE SAME TIME DRAMATICALLY REDUCING THE AGENCY'S COSTS OF APPROXAMATLY \$927,00,000.00 A YEAR

THE AFORMENTIONED PROVED THAT ENFORCEMENTS' WILLFUL , WHIMSICAL FRAUDULENT OMISSION OF MATERIAL FACTS' FACILITATED BY OVERZEALOUS ENFORCEMENT PROSECUTORS' WHOSE METHOD OF COMPENSATION MUST, ON INFORMATION AND BELIEF, ENFORCE FRAUDULENT BEHAVIOR THAT THE STRATEGIC PLAN SHOULD UNDERMINE WITH FACTS' THE STRATEGIC PLAN I HAVE DISPENDED TO THIS COMMISSION FOR A REQUESTED \$2,800,000.00 PAYABLE OVER ONE YEAR AS DISCUSSED IN PRIOR SUBMISSIONS AND OR PAID AS A SUBCONTRACTOR, TOGETHER WITH A WHISTLEBLOWER CLAIM, AFTER CREDITING THE \$2,800,000.00 OF 20% OF SUCH IMPLEMENTATIONS SAVINGS AFTER AUDIT AND FOR EACH OF THE NEXT 5 YEARS PAYABLE ON THE ANIVERSERY DATE FOR EACH YEAR THE PLAN , IN WHOLE AND OR IMPART REDUCES THE AGENCY'S COSTS AND FOR 5 YEAR FROM THE DATE OF ITS IMPLIMENTATION BY THE AGENCY, REGARDLESS OF WHO THE ENTITY OR AGENCY IS THAT PROVIDES THE SERVICES..

THIS COMMISSION'S WELLS APPROVAL , AS ITS' INITIATION OF THE COMPLAINT SERVED ON ME, AND SUBSEQUENTLY REPLICATED IN THE COMPLAINT APPROVED BY THIS COMMISSION AND SUBMITTED TO JUDGE MURRAY AND JUDGE GRIMES AND WHICH CONSTITUTED A MALICIOUS FRAUD AGAINST THIS COMMISSION AND ME; WHICH ENFORCEMENTS' INFORMATION WAS FRAUDULENT AND WAS KNOWINGLY FALSE AND WHICH DAMAGED MY REPUTATION AND MY FAMILY'S WELL BEING FINANCAILLY, EMOTIONALLY AND ROBBED ME OF MY TIME, FOR 4 , OUT OF THE 5 YEARS, I HAD TO WORK ON DEFENDING A KNOWINGLY MALICIOUS, WILFULLY DEVIOUS, DISENGENUOUS, REPRIHENSIBLE AND KNOWINGLY INSCERE COMPLAINT WHICH ENFORCEMENT KNEW WAS CAUSING ME BODILY FUNCTION DAMAGES AS EVIDENCED BY MY FREQUENT HOSPITALIZATIONS WOULD HAVE GIVEN ME EEIF BY

SVING PORTION OF THE TIME THEY STOLE; BUT INSTEAD FLIGHT MORE DAMAGE WHEN JUDGE MURRAY SWITCHED ADJLS, AND WHEN JUDGE GRIMES DISOLVED THE POSTPONEMENT SINCE HE NOWING THAT HE WAS FALSAUNTING SUCH POWER DOWN THE THROAT OF JUDGE FEOLAK WHO FOUND BEFORE THE DISOLUTION THAT I WOULD BE IRREPERABLY HARME IF FORCED TO TESTIFY. HIS REASON ASCERTED AT THE TIME WAS:

.. 'had the allegations' in the OIP not been there; he would have considered such postponement relief'

So the knowingly false complaint allegations' as to damage my reputation, as his finding went virile and he as this Commission and Judge Murray believed I was a devil dog; when the facts were the exact opposite of what they alleged in the complaint.

The theft of time also included: enforcements' aiding and abetting the Mc Farlane Enterprise, to steal away from me the ability - the time] to sue Mr. William Mc farlane of Scottsdale, Arizona, Ms. Monica Petty, Mr. Craig Wayne, Mr. Tom Sullivan, Mr. Ara Berkedejian, Mr. Greg lange, Mr. Wm. Heistercamp and of course Ms. Teresa Puccio the N. j Enterprise leader; whose mantle enforcement chose to pick up, defrauding the Commission, judge Grimes, judge Murray, me, Mr. Agostini, Mr. Lawrence lux, the 3 innocent defendants for "Crimes, never perpetrated"; but which enforcement knew by complining would rob my time and it did while they basked in the sunlight at my, M. Agostini and Mr LUXS' expense ..

It is with honor that I bestow on the commission the underlying facts' of this case; as an object lesson; that it should strive to use its powers to protect our citizens', to safeguard our nation by implementation of the plan ; which not only save our nations' money ; but innocent would be defendants' from the perils of rogue enforcement personnel whose motives are for their own monetary goals and reputations' being elongated , at all of our mutual expenses, while those they stole the time from suffers financially from times loss, as well as emotionally , reputationally and familys ' shame. The crucifixion of the last legs of my life needs to be remedied and only this commission can make it right.

THEREFORE THE NET SAVINGS PROJECTED BY ME SHOULD BE FOR EACH AND EVERY CASE WHERE NO WELLS LETTERS REQUEST FOR INITIATION OF A COMPLAINT IN HOUSE, AND WAS RESPONSIBLE FOR A NO BILL AND OR AN ELIMINATION OF THE IN HOUSE SYSTEM; USING CBI [OR ITS SUBSTITUTION AS THE COMMISSION SO DEEMS' FOR THE NO BILL AND FOR THE COMMISSIONS' ASSIGNMENT; BASED ON DEFENDANT REQUEST , IF GRANTED THE ALTERNATIVE REMEDY AVAILABLE TO THOSE NAMED BY INITIATION OF THE PLAN, AND ACCEPTED BY THE COMMISSIONERS PRIOR TO INITIATION OF AN IN HOUSE FORUM, OF A RETIRED FEDERAL AND OR STATE COURT JUDGE ADJUDICATION A COMPLAINT WHEREBY THE DEFENDANTS' LEVEL OF POTENTIAL GUILT IS MITIGATED AND OR ELIMINATED AFTER HEARING BEFORE RETIRED JUDGE ; RATHER THAN THE IN HOUSE AND WHERE THE DEFENDANT IN THAT SCENARIO IS ADJUDICATED WITHOUT PRESS AND IN CAMERA , AS A RESULT OF CBI'S SUBMISSION PRIOR TO THE COMPLAINTS' ISSUANCE AND WHICH LESSENERED THE GUILT INITIALLY PROPOSED BY ENFORCEMENT AND OR ELIMINATED IT ENTIRELY AFTER THE HEARING OF A RETIRED JUDGE; AND OR BY COMMISSIONS' NEGATING OF AN INITIATION FROM WELLS OF ENFORCEMENTS' REQUESTED REMEDY AT LAW..

My case was judged to cost about \$1,000,000.00 by judge Grimes findings and assuming that is the average SEC cost ; then the strategic plans implementation costing \$67,000.00 per average per case . Starting with an assumed 120 receiving a commission reprieve based on implementation of the plan out

of 600: [COSTS:\$35,000.00 for no bill, by Commission finding, and COSTS \$46,000.00 additional for 37 cases out of another 60 for the 50/50retired judge findings whith the total cost for120 cases going in and with 115 defendant wins coming out of that number and the remainder receiving the retired judges guilt finding for a modified retired judges hearing for the 50/50 solution based on the commission's findings]with 75 a no bill and the other 50 and assuming 115 saves of the 120 by this process. That should therefore generate a\$927,000.00,000.00 reduction of costs for the SEC.

In addition to my[CBI is my assigns fee as a whistleblower I request 15% of the savings my plan implementation is projected to save our government for 5years and deducting from the 15% paid each year the \$2,800,000.00. I will co sign the whistleblower for as part of this claim with CBI and its assigne.

Respectfully

Em Daspin (with circled initials)

Edward M. Daspin PRO SEE (THE PLAN)

CERTIFICATE OF SERVICE ON 9/12/18 AS SWORN BY ME ON THIS DAY TO DELIVERY TO UPS-----

Em Daspin (with circled initials)

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

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

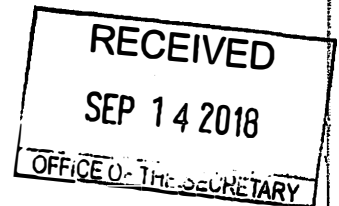
THE HONORABLE SPEAKER OF THE HOUSE, THE HONORABLE PAUL RYAN

MR. FIELD OR THE COMMISSIONERS (3 COPIES)

MS. SHIELDS (1 COPY FOR THE JUDGE BRENDA MURRAY;

THE HONORABLE JAMES GRIMES, THE HONORABLE CAROL FEOLAK

MR MCGRATH, MR KOLODNY, MR O'CONNELL, MR SHAPANKA, MR. AGOSTINI, MR LUX, MR L CHESTER MAY FOR MKMA & ME FOR CBI, MR LUIGI AGOSTINI (CORPORATE STAFF, MR GARY KRENSEL CORPORATE STAFF)



From: "edwardDaspin" <emdaspin2@optonline.net>
To: mshapanka@optonline.net, schieldsk@sec.gov, mcgrathk@sec.gov
Bcc: lagostini@yahoo.com
Date: 09/09/2018 12:08:11 PM
Subject: FW: Re: In the Matter of Edward Daspin et al. - A.P. File No. 3-16509[part of record]
Attachments: E M DASPIN PRO SE.docx (36KB)

Dear MS Schields:

Please distribute to Mr. Field for the commissioners as well as to Judge Murray in the above captioned matters; In the 9/6/18 declaration I made to the commissioner pg 5 para 15, misstates the use of the \$350.00 fee as in the case of my being an ombudsmen there will be approx. \$50,00 for the legal secretarery that reduces not adds to the \$350.00 costs of the 3rd member to the triumvirate ombudsmen team a corporate and sec knowledgeable layer will further reduce the balance to about a\$166.00 left for G an a and a pretax profit!if the commissioner accept exhibits' offer for cbi to serve as a balancing against before the complaint is initiated and after the Wells' submissions were made during which enforcement will disclose in confidence to the CBI legal team assigned that case all exculpatory evidence and Brady, and reliance on depositions and exhibits one it files Brady going CBI 2 weeks before potent, defendant files and to learn the case, points of law and await the defendants well response. Than one week late a committee of 5 lawyers will judge the case managers proposed commissioner letter asking for either a no Bill, a 50/50 compromise for retired judge[pre approved by the commissioners', will adjudicate a confidential hearing the case and provide it to the comsioners' first for approval correction and /or modification. The defenses law firm will pre approve CBIS' right to its reply and a 50/50 confidential hearing to set a financial penalty if any and or a no bill without adverse effects on the defendant; oa complaint with in house. It is beleveld that 20% of the in house defendants will be saved from commissioners' complaint inltatlton and that will give the adjs a 20%lss caseload o have more time for justice to prevail. It will balance the scales to Dodd franks disability to do so; thus Dodd Frank as the defendant received a fair hearings and peaceful resolution Cbi will, at the approval of the defendant join in the deal-maker negotiations of a settlement in the 50/50 matters thought to eliminate 50% of that portion 20\$ tht goes to a retire and acceptable to the Commissioners' federal judge[s] or state judge[s] for hearing where the complaints iffy and to protect their confidentiality if the case is dismissed using SEC rules rather than Rules of Cival procedure, but with the judge not eliminating limited die process and discovery if not settled by CBI deal makers.

I enclose a letter to enforcement's' Mr Mc. Grath sent by me in 2015, rather than eliminating the SEC action after receipt the enforcement division continued theft of my time and up to (9/6/18 did not capitulate.!![The willfulness astounds me that the young tigers were not corraled and made to give penance for their crimes against the commissioners, the adjs and me and my family and codefendats

Finally, by the elimination of this contesting MY recent commissions and judge Murrays' submissions by me, they give the inference of my submission factual statements to the fraud they perpetrated on the Commission, Judge Murray and myself and co defendants and enforcement receiving a release based on thinking they were dealing with a judge that was bonafide ; I ask that their settlements be void and no effect and Mr Agostlins' fines; be repaid and for their acceptance of paying me and cbi for the work product derived by my use of the time the stole to constructively prevent future defendant[s] allegations that the process of Dodd Frank is marred, biased [which it is] ; but the CBI ombudsmen' role will off set that; and partially eliminate aggrieved defendants' claims to the contrary w hope]; i is[to their detriment as the CBI Ombudsmen will balance the pre complaint issuance tables to enable the commissioners' to hear both sides if it exists. and doing so ives me and the commission he ability for repatriation of compensation for the theft of time occasioned by the prosecutor mlscnduct, the omission of material facts to the commissioners' in the Wells and by that fraud and commissioners reliance on same, cause the theft of my and cbis' time at the published rates.

----- Begin forwarded message -----

Subject: Re: In the Matter of Edward Daspin et al. - A.P. File No. 3-16509
Date: 12/21/15 12:21:50 AM
From: emdaspin2@optimum.net
To: "McGrath, Kevin" <McGrathK@SEC.GOV >
Cc: "ALJ" <ALJ@SEC.GOV >, "Perlman, Benjamin" <perlmanbe@SEC.GOV >, "ebxonline@yahoo.com" <ebxonline@yahoo.com >, "O'Connell, Barry" <OConnellB@SEC.GOV >, "Shields, Kathy Moore" <ShieldsK@SEC.GOV >, "Kolodny, Nathaniel" <kolodnyn@SEC.GOV >

DEar Mr Perlman, Please excuse me but the attached cover letter to the rebuttal brief to the divisions prehearing allegations that I recently transmitted to you for the courts indulgence covers , as an overview some of the highlighted points with respect to the lack of merit that has become clear as a result of the divisions forthrightness by remitting the exculpatory evidence tome.

the cover letter enclosed herewith demonstrates that there are no longer any allegations of wrongful conduct that can be sustained based upon the evidence.

The court should take judicial notice that the SECs brief intends to call witness that I have proven to the court has one agenda; to lie every step of the way:

1] to enable them to eliminate the pension liability they most certainly have for invading the self directed pension and using the shares as collateral for advances without returning the pension assets that were sold to WMMA as the forward stock redemption plan has provided WMMA with the absolute right to offset the advances by reducing the amount of provided units. The end result is unless they can convince the court that they were defrauded they will owe the IRS the 50% penalty .or early redemption of the shares pledged by using the self directed assets.

Dear Mr Perlman, Enclosed is the cover letter to Mr Field of the defendants rebuttal to the divisions prehearing memorandum; please take judicial notice that all the witness that invested in WMMA have pledged in the dishonest tape of 7/19/12 to collude together alleging that I controlled wmma. The tape proves that they know the allegation is untrue. The investor witness have an additional motivation to lie since if this court finds the defendants innocent and that WMMA did not defraud the investors which we believe is true, than the investors use of the pension assets for the cash advances have diminished the face value of the preferred of WMMA and since the preferred shares have been offset the investors are responsible for invading the pension and not returning the loan within the 60dayperiod.This liability gives the investor "witness a powerful motivation to lie and the court must be made aware of the reason that motivates a witness to be truthful or not.! The enclosed recap will assist the court to separate the wheat from the chaf.!!

Respectfully

E.M Daspin Pro SE

From: "McGrath, Kevin"

Date: Sunday, December 20, 2015 12:35 pm

Subject: In the Matter of Edward Daspin et al. - A.P. File No. 3-16509

To: ALJ , "Perlman, Benjamin"

Cc: "emdaspin2@optimum.net " , "ebxonline@yahoo.com " , "O'Connell, Barry" , "Shields, Kathy Moore" , "Kolodny, Nathaniel"

> Mr. Perlman:

>

> Attached for Judge Grimes's attention please find a courtesy
> copy of a letter dated December 20, 2015 addressed to Judge
> Grimes. The original, and three copies of the letter, are being
> sent to the Secretary's office via UPS overnight.

>

> Respectfully,

>

> Kevin P. McGrath

>

>

E M DASPIN PRO SE

4 Pineveiw lane

BOONTON.N.J 07005 C=973-919-0070 E MAIL

EM DASPIN 2@OPTONLINE ,NET

CASE 3-16509

Dear Mr Feild;

I enclose herewith My response to the Secs' prehearing memorandum; which tracks the SECs allegations and my response to each issue that the Sec relied on and contravenes the allegations, with facts and through the use of the exculpatory evidence that the division was kind enough to furnish me eliminates the claims as just that a claim with no substance after eliminating the sophistry.

One thing is for certain, I pled guilty to a crime 40 years ago and that's not just cause to punish me and/or permit investors to raid the cookie jar with the government said. In 40 years I haven't lost a case as I am honest hard working and fair. Yet many times when an individual believes that my felony will give them an edge they are proven wrong as judges and juries can discern the truth . Here the truth is very clear.

Once the SEC flagrant use of adjectives such as" victims "to describe the investors is pulled out, the innuendos of wrongful conduct are flushed from the divisions claim s , there is no substance left , to all allegations of wrong doing.

The divisions entire case started out alleging that I controlled wmma . This proffer has been proven false as the Main emails to Jareyll , advising Mr jarryll to contact MR Troppelo when he could not be reached ,as Mr Troppelo would provide Mr Mains directions and MR MAINS organization chart was referred to as the chain of command. The organization chart demonstrates there was no room for me and or MKMA to be involved in wmma's operations Mr Main was the President and he reported to Mr Lux and all WMMA employees were under Mr Mains sr vps and down the line..The Process was repeated when Mc Farlane took over and the new org chart just put Mc Farlane where Main was and Main above and then Lux. As a matter of fact the depositions of larry Lux ,an SEC cooperating witness' demonstrates that the WMMA boards resolutions' ran WMMA and directed the wmma officers' who were all joint venture wmma partners and/ or warrant holders.

Mike Nwugugu ,another WMMA and SEC witness, around whom the SEC complaint was apparently crafted, has recanted some important allegations and contravened the Divisions complaints' allegations as well as his admissions that he drafted the WMMA /WDIIPPMs'; as in his Chartis insurance claims. Armed with these admissions that Lux and Agostini and Main and Burnham agreed that I was a consultant [Sullivan stated to the Sec that both Bernham and Main informed him I was only a consultant and not a director and a non - officer of WMMA; the responsibilities for the content and/or lack thereof, in the WMMA ppm's cannot be placed at my table nor Agostinis' place mat any longer. In addition the, JULY 31,2011 and DEC 5th, 2012PPMs do not hide any disclosures that the Sec witness admit they shared with each other as contained in the exculpatory information ie, Burnham makes it clear every investor knew the Daspin family was a large shareholder of WMMA![He should have stated a warrant holder in WMMAH but the essence of the Daspin family having a strong share position in the company's captioned WMMA was very clear. [1]

In addition the WMMAS' boards' independence of me is self-evident by admissions 'in the Lux depositions that the SEC took on Oct 16,2014,as corroborated by Mr Agostini complaint answer and pursuant to MR Mains' organization chart excluding me conclusively prove that I was a consultant, that the role as in the wmma PPMs of mkma and CBI as also stated in each employees contact demonstrate the extensive areas of expertise that MKMA and myself had. All applicants knew that I was as a disclosed MKMA onsite srav of MKMA'.In effect the SEC complains that the consulting roles were larger than they should have been ,but forgets that MkMA was the only consultant that left 95% of its fees deferred.

In effect had MKMA not provided the services a substitute would have been very costly as mr Sheeler cost the SEC 3 times MKMAS rate by the hour and then only 10% of the lower rate was paid to MKMA equaling a paid fee equal to 3% of Mr Sheeler's fees!. The admissions of the witness of the SEC contained in the exculpatory evidence collectively prove that all investors were pre investment informed of my back ground and real last name and of the fact that my wife's family limited partnerships were the beneficiary of to be issued shares of WMMAH, and which She sold on the day the WMMAH corporation was formed by a re- assignment from cbi to her and then to Lux, Agostini and Main.

This sale with a warrant to purchase would only be exercised if WMMA was making money and had no litigation as her reason for the reassignment was that I recommended it so that the operators whom would provide her a warrant to purchase the shares assigned, and which she sold to them under the conditional sales agreement ;they would have the power to run the company and with no one person in control ,but rather the three would hve to get along to make the company profitable.

By divesting cbis' service contract to MKMA and my wife disengaging from WMMAH share ownership there was no material reason for disclosure of an non – offerors' assignment of unissued shares to the 3 largest shareholders of WMMAH AS WMMAH WAS NOT AN OFFEROR NOR WERE THE PRIVATE SALE of share rights never issued but reassigned A MATERIAL TRANSACTION AS Mrs Daspin played no active role in the operations of Wmma other than she had loaned money to WMMA and until she was repaid she had co-signatory powers' on WMMAS check book.

Not only did she only sign 6-8 checks during the 30 months when Mr Agostini was not available to sign and with the consent of Mr Main who as WMMAs secretary had the power to appoint all check signers; but during Jan 2012,Mr Main ordered 4 co-signatures to appear on the WMMA checks including one of Mr Agostini and either LuX[CEO] Puccio[Chief admin and finance Sr VP] and Sullivan ,(CFO).The latter 3 signed the signature cards but chose to not have the burden of being a co-signatures' and with Sullivan and Puccio misleading the SEC into alleging the Agostini , as alleged MY direction denied them access of the financial transactions of WMMA ,the company they had invested considerable resources in.

. In fact there is a series of emails from Puccio and Sullivan, demonstrating contrary to the SEC allegations, that they had complete audit access of all.WMMA accounts and QuickBooks and were to lazy to do the check entries on a start up company doing no revenue; so thy hired the bookkeeper for the general ledger work. as they had the bank accounts an the companies quick books and the hired a bookkeeper to provide all entries each month to track all transactions. Contrary to the SECs allegations that the 3 financial officers were deprived of access by myself and/or Mr Agostini. I wasn't an officer and/ or director so the allegation was disingenuous and made the SEC look like they made an effort to take the low road.

In any event with the admissions that I did not participate as a board member and admissions by the directors that I did not control them , and the further admissions that Nwugugu actually filed an insurance claim for \$650,000.0 for preparation of the WMMMA ppms' there was absolutely no cause for the SEC to attempt to allege control. In addition, the SECs' allegation that the disclosure documents failed to identify me and my full name was made a meaningless diversion; as the exculpatory disclosures and my signatures on all the WMMA employment agreements prove that all investors knew well enough in advance about who I was, my felony conviction from 1973 and some failed business that I had been involved in. All those disclosures were admitted by some of the applicants and the remaining applicants exculpatory information and my signatures on the employment agreements prove conclusively that all investors knew the fact about EM Daspin prior to investing and that any Sec allegations regarding investor reliance on an IMC appraisal was unjustified as the only investors that invested after the appraisal ,MR Locket and Mr Heisterkamph, filed insurance claims with Chartis alleging that the reasons' they invested had nothing to do with the imc appraisal and even if it had the lmc appraisal was posted on a non- gaap compilation and unaudited statement of Oct 31,22011;which was the only balance sheet that the 3 financial officers had created during the months they ran the company's' financial books. Therefore; since all the financial statement contained in the WMMA ppms were disclaimed projections and the PPMs contained a cautionary declaration that the financial information was unaudited and that there were unposted \$1,500,000.00 of differed salaries due employees! No one would rely on any balance sheet especially on a non- gaap appraised by MKMA as noted in the footnotes and which the PPMs related party transactions showed had an unwaiavable conflict of interest; as it was a consultant and its ceo owned shares in the WMMAH.

There could be no reliance on financial information except as analyzed by the WMMA ppms related party transactions which disclosed each investors amount of purchase as in the shareholder section and the related party and risk sections and from questions that all investors warranted, in the subscription agreements, they had answered to their satisfaction. In effect each non- disclosure alleged by the sec was either admitted to have been disclosed by Mr Burnham, wmmas' sr vp H/R, and /or thru the Wmma ppms so that the only reliance an investor could have was that based upon the wmma ppms that disclosed that wmma was a first stage startup ,losing money ,that the investor was making a speculative investment and the risk of loss loomed greatly in the Bespeaks caution section of the ppms.

The investors were not solicited by the interviewers as each employee wanting a job was not required to invest as the division has led Judge Grimes to believe. The reason is that all sweat equity candidates were given net warrants at the inside price so if Wmma made the projections the net warrant could have a \$3-\$5million dollar value. This free warrant as a trade for a deferred salary until the company made A \$1.00 PROFIT DEMONSTRATED NO NEED TO INVEST EXCEPT THAT WMMA HAD A FOREWARD STOCK REPURCHASE LOAN SECURED BY A PORTION OF THE SHARES THAT WERE ACQUIRED. The funds were usually frozen by the pension laws and the only access without a 50% penalty, was on a self-directed basis. WMMA had engineered the way for a person to obtain their investment as a tax free loan paying 2.5% per month until WMMA became profitable with no guarantees.

That's the only difference from the sweat equity employment, so the investment was always at the employees request, as if the employee needed the cash flow until the company could fund the salary's; was by investing the pension funds and receiving the 2.5% until the company made a profit or until wmmas net worth was \$2,500,000.00 or until it ran out of business which was clearly disclaimed. Then the advances would automatically stop if the equity was reduced in half.

In addition, to the fact that the history demonstrates that WMMA sweat equity employees were 80% sweat that proved that WMMA was not running a bucket shop or looking for cash flow to support an extravagant life style .In fact the reconciliation of the Daspin loans and expense reimbursement and start expenses demonstrate that after crediting all authorized payments that Daspin netted \$25,000.00 for 30 months of fulltime effort. The books of WMMA also showed that the Daspin consulting firms provided Wmma \$3,000,000.00 of working capital deferred fees and/or forgiven fees and that the service contract limited MKMAs ability to receive earned fees by capping fee payments at no more than 10% of incremental equity and/ or 10% of pretax profit. So there was no way that wmma could be rendered insolvent by MKMA fee payments as the SEC disingenuously alleged.

Further the MKMA/WMMA contract provided WMMA the absolute right to toll all fee payments if such payment would adversely affect WMMAS financial position and to make matters better MKMA took a 66% fee haircut by modifying its service agreement on DEC8,2011 so that it could only receive a fee based on and equal to the highest WMMAS' employee payment for the year.

Thus the service contract was the reverse of the sec allegations that it was arranged to milk wmma and/or that the fees were so high that they could bankrupt the company. All these facts were clearly contravened by the facts recited in the MKMA DEC 8,2011 modified agreement and in the Dec 15,EX A commission CBI agreement which was assigned to MKMA in Jan 20,2011. Therefore the Sec is trying to knock down wind mills and really left with the following:

If all investors knew who Daspin was prior to investing and if all knew the financial condition of wmma was tenuous and that any investment was speculative as the WMMA PPMs risk section makes clear, does the Sec have a case that Daspin owes anyone disgorgement of fees which made Daspin the least paid person that the company hired based upon an average of \$1,000.00 per month after deducting all DASPIN loans and expense reimbursements of audited expenses with Larry Liux along on every trip as he was the CEO of WMMA

Does the SEC have a case if the WMMA PPMs did not disclose Daspins last name and/ or felony and or sub consulting role with WMMA if the employment agreement every investor signed, was signed by Mr Daspin using his full name and if Mr Bernham advised all applicants as did Daspin and as declared for By 3 witness that declared the same disclosures before a federal bankruptcy court and where the exculpatory evidence discloses that all the investors knew before investing that Mr Daspin was a consultant whose wife owned warrants for a majority of WMMAH and/ or WMMAH and that Daspins' fees were fully disclosed in the wmma ppms and all the employment agreements' Daspin signed.

Does Mr Lockett and or Heisterkamp have a claim against Mr Daspin for reliance on Ms Puccios disclosure that she believed that WMMA was a Ponzie scheme in DEC of 2011 and did not share that with the aforementioned Investors, knowing that in March 2012 she invested \$100,000.00 in WMMAH1 and or a claim against Daspin for Wm Mac Farlane alleging he was not WMMAs' President when they both admitted that they saw Mc Farlane admit he was on TV and that WMMA has 3 signed contracts by him as WMMAS President? [That's the Chartis claim that both made as the fraud they relied upon.]

Does Sullivan ,Berjedekian and Puccio have any claim against Daspin for investing In WMMa knowing that Daspin was a consultant as disclosed by Main and Benham and as Mr Young advised Both Berjedekian and Puccio that Daspin was a felon ,that his wife had warrants from the 3 directors in WMMAh and do any of them have a claim knowing prior to investing that Daspin was a consultant whose role for MKMAs was to Be its senior officer having the responsibilities outlined in the employment agreements they signed and after having read the WMMA PPMs related party section which discloses the CBI and MKMA massive contributions to WMMA and knowing Daspins' felony conviction which they admitted they knew up front whether or not either of them alleges that Daspin made representations to them that the WMMA PPM ,they warranted in their subscription agreement they relied upon, advised them that no person was authorized to make any representations to them that was not in the July 31,2011 WMMAPPM and despite the WMMA ppm demonstrating that WMMA was a first stage start up ,losing money and no assurance it would ever make money and no assurance that WMMA would have any money available to sellout the remainder of the subscription agreements? Does the fact that Daspin was unjustly accused of using Mr Mains' investment for his own financial gain when the facts disclosed shortly thereafter that the check payments were loan repayments made to Mr Daspins' wife , that the Sec has documented the loans and can attest to the fact that WMMA, Sullivan Berjedekian ,apology in writing and the hold harmless and indemnification for any causes of action ran from DEC 9,2011 back to the beginning of time was given by them to Mr Daspin and to MKMA provide them any cause of action against Mr Daspin based upon their knowledge of Mr Daspin, background prior to investing in Oct 2011 give them any cause of action against Mr Daspin.?

Another SEC allegation is that the IMC appraisal was inflated but the SEC can't prove that even if arguendo, it was true, even if they were correct ,which they are not; that any investor was injured as a result of an inflated appraisal dated before WMMAS indemnification and hold harmless and with the understanding that they [All the investors except Lockett and Heisterkamp,] participated in the conversation concerning the appraisal and used the appraisal that they were heard agreeing that the appraisal WAS FAIR AND THAT AFTER THE CONVERSATION THEY INCLUDED THE APPRAISEL in THE Oct 31,2011 WMMA NON Gaap, UNAUDITED Compilation; the only investors that invested after the lmc appraisal was Lockett and Heisterkamp and both filed claims with Chartis with claims that had nothing tpo do with allegations about the IMC Balance sheet which was contained I the Jan 5th WMMAPPM and which the entire financials were disclaimed within the ppms text

Bear In mind that the Investors are both MBAs and accredited investors that warranted they had received all answers' to all their respective questions and were satisfied, which implies that if they had an Imc contract appraisal question that concerned them as the related party transactions demonstrated that MKMA had an unswayable conflict of interest and that its N.J officer was a convicted felon which all investors knew. Are there any Investors that were injured by the reliance on the veracity of the non-GAAP unaudited compilation appraisal and also bear in mind that Lockett visited IMC prior to is investment being deposited into the WMMA account and he is an expert Information technology Guru and he praised Beryl Wolk at the highest level.

IN addition; one should bear in Mind that Mr Heisterkamph rushed to back date his subscription agreement as the divorce court had restrained him from using the pension funds he wanted to deprive his wife and the mother of his children from having so he used WMMA as the vehicle to remove his assets, those frozen by a court order Was he also the non-accredited investor that complained about Puccios' and Mc Farlane' fraud as the reason he invested. Im sure he will not change that allegation as its criminal fraud to file a trumped up insurance claim AND WHEN THAT DOESN'T WORK file a new claim for a 2nd bite at the apple. IN addition Mr Heisterkamph filed an unemployment claim in Michican after he quite by not showing up for work. The Administraive law judge found him a joint venture WMMA partner who had fabricated a story that the advance forward redemption for the shares he alleged was the proof that he was on a salary!. Once wmma showed the administrative judge the facts Mr Heisterkamph was turned down from any unemployment as the judge found that he hadn't been paid any salary and the checks were advances of his own investment and not as he alleged to the court.

In addition both Lockett and heisterkamph were heard on the dishonest tape of 7/19/12 with Mr Lockett, who in effect stated that .."well Push him[me] against the wall and say sorry kid but your in trouble and we cant help you but if you work it out with Mc farlane maybe we can do something like a release,"In the other admission by Lockett he sent Puccio an email, stating that "it was you who.." and he berated MS Puccio for selling him on investing in WMMA and for forcing him to invest another \$100,000.00 in WMMA as he had exercised the one month option, to invest after he tried out WMMA for a month before exercising WMMAs option for additional shares.. He admits in the email that Puccio spilled the beans about him trying to force me to sell WMMA on the cheep and that she had put him in a bad light with ed" During the time he started working he visited IMC praised the Imc database as he was to integrate the database with the to be designed WMMA interface he had in mind.

The next line of attack was the SECs allegation that I was not visible in the WMMA PPMs after I had been asked to become a subcontractor by some of Wmmas board members and other officers including Doug Main who informed me that if I was named as the consultant for WMMA the state boxing commission and certain country corporations commissioners would not license WMMA due to my felony and that WMMA would not be able to obtain E and o insurance .In addition it was to my economic advantage to receive income thru one CBI as it could be the subcontractor but In order to accommodate WMMA I had to give up 50% of the WMMA commissions by involving MKMA in the service contract .

The SEC now knows that all the allegations of non-disclosures in the WMMA PPMs were more than compensated by the honest disclosures by me, Young Bernham ,Nwugugu ,Troppelo, May and Agostini so that each and every investor can no longer allege they did not have the disclosures prior to investing in WMMA as the exculpatory information and emails and declarations in bankruptcy court and the dishonest shareholder meeting proves all investors were informed.

The sec has no case there was no one damaged as all investors received the disclosures and cannot allege reliance between the PPMs, the subscription agreements; the exculpatory the employment contracts signed by me prior to any investment and the admissions and scope of MKMAS related party transaction[s] provide a vice that is unbreakable and which precludes allegations of non-disclosure and or reliance as meritless

I respectfully enclose the Response to the SECs prehearing conference. I have sent the enclosure to the division by email


E.M. Dorman Esq. Se

Service list email; Mr Kolodney, Mr Mc Grath, Mr Perlmann; Mr Shapanka MrAgostini

9/10/2018

the tragic theft of my time and its diversion to non monetary strategic plan as the only recipient of my stolen time based on commissions by e...

From: "Edward Daspin" <emdaspin2@optonline.net>
To: schieldsk@sec.gov, mshapanka@optonline.net
Bcc: lagostini@yahoo.com
Date: 09/10/2018 09:52:06 AM
Subject: the tragic theft of my time and its diversion to non monetary strategic plan as the only recipient of my stolen time based on commissions by enforcement of material facts that had they been included in the wells submissions would have led to a NO BILL. I BELIEVE THAT SUCH OVERZEALOUS AND OMISSIONS OF MATERIAL FACTS THEFT OF TIME!
Attachments: E M DASPIN PRO SE (2).docx (36KB)

Dear Kathy ;

Enclosed is the attachment to the email sent you yesterday that I referred to. Please attach it to the email's text as the attachment of 9/9/2018@12:08:11 time referred that also outlines that the enforcement divisions Mr Ben Perlman, was well aware that the New York divisions' continuation of its pursuing me by omitting the material information it had, prior to the Wells submission also proves that the Washington head enforcement agency was aware of the fraud being perpetrated against them and myself and Whitfield the exculpatory evidence regardless of its inherent omissions of material facts. Indeed I can trace headquarters knowledge back to 2015 when I specifically accused enforcement: OF ROBBING MY TIME BY THE WILLFUL OMISSION OF MATERIAL FACTS WHICH IF KNOWN WOULD HAVE RESULTED IN A NO BILL AND INDEED I BELIEVE THAT EMAIL AND THIS WERE EMAILS THAT JUDGE GRIMES AND ENFORCEMENT ALLEGED WERE FILED NOT IN ACCORDANCE WITH THE RULES. THERE IS NO QUESTION THAT THE OMISSION OF MATERIAL FACTS WAS KNOWN AT THE TOP OF THE FOOD CHAIN (NOT ENFORCEMENT'S HEAD BUT AT THE BEN PERLMAN LEVEL ON 2015 AND DESPITE THAT THEY CONTINUED ALLEGING WILLFULLY FRAUDULENT "FACTS", KNOWING BY PROTRACTING THE CASE THEY WERE ROBBING MY TIME AND WITHOUT DUE PROCESS AUTHORIZING THEM TO TIME DIVERTING IT TOWARD THE AGENCY'S SIDE OF THE EQUATION FOR WHICH I'M FILING THE CLAIM FOR THE FOUR YEARS SPENT DEVELOPING, BY COERCION, THE STRATEGIC PLAN TO THE EXCLUSION OF MY OWN CONSULTING TIME SPENT ON BUSINESS OBJECTIVES

RESPECTFULLY



E M DASPIN PRO SE [PLEASE ATTACH TO MY ADDENDUM PREVIOUSLY SUBMITTED ON 9/6/18]

E M DASPIN PRO SE

4 Pineveiw lane

BOONTON.N.J 07005 C=973-919-0070 EeMAIL

EM DASPIN 2@OPTONLINE ,NET

CASE 3-16509

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Not only did she only sign 6-8 checks during the 30 months when Mr Agostini was not available to sign and with the consent of Mr Main who as WMMAs secretary had the power to appoint all check signers; but during 2012,Mr Main ordered 4 co-signatures to appear on the WMMMA checks including one of Mr Agostini and either LuX[CEO] Puccio[Chief admin and finance Sr VP] and Sullivan ,(CFO).The latter 3 signed the signature cards but chose to not have the burden of being a co-signatures' and with Sullivan and Puccio misleading the SEC into alleging the Agostiniq as alleged MY direction denied them access of the financial transactions of WMMMA ,the company they had invested considerable resources in.

. In fact I have a series of emails from Puccio and Sullivan, demonstrating contrary to the SEC allegations, that they had complete audit access of all WMMMA accounts and QuickBooks and were to lazy to do the book entries on a start up company doing no revenue; so thy hired the bookkeeper for the general book work. as they had the bank accounts an the companies quick books and the hired a bookkeeper to provide all entries each month to track all transactions. Contrary to the SECs allegationso that the 2 financial officers were deprived of access by myself and/or Mr Agostini. I wasn't an officer and/or CFO so the allegation was disingenuous and made the SEC look like they made an effort to take the blame.

In any event with the admissions that I did not participate as a board member and admissions by the directors that I did not control them , and the further admissions that Nwugugu actually filed an insurance claim for \$650,000.0 for preparation of the WMMMA ppms' there was absolutely no cause for the SEC to attempt to allege control. In addition, the SECs' allegation that the disclosure documents failed to identify me and my full name was made a meaningless diversion; as the exculpatory disclosures and my signatures on all the WMMA employment agreements prove that all investors knew well enough in advance about who I was, my felony conviction from 1973 and some failed business that I had been involved in. All those disclosures were admitted by some of the applicants and the remaining applicants exculpatory information and my signatures on the employment agreements prove conclusively that all investors knew the fact about EM Daspin prior to investing and that any Sec allegations regarding investor reliance on an IMC appraisal was unjustified as the only investors that invested after the appraisal were Lockett and Mr Heisterkamp, filed insurance claims with Chartis alleging that the reasons' they invested had nothing to do with the imc appraisal and even if it had the Imc appraisal was posted on a non-gaap compilation and unaudited statement of Oct 31,22011;which was the only balance sheet that the 3 financial officers had created during the months they ran the company's' financial books. Therefore the only financial statement contained in the WMMA ppms were disclaimed projections and the PPMs contained a cautionary declaration that the financial information was unaudited and that there were expected \$1,500,000.00 of differed salaries due employees! No one would rely on any balance sheet especially on a non-gaap appraised by MKMA as noted in the footnotes and which the PPMs related many transactions showed had an unwaiavable conflict of interest; as it was a consultant and its ceo owned shares in the WMMAH.

There could be no reliance on financial information except as analyzed by the WMMA ppms related party transactions which disclosed each investors amount of purchase as in the shareholder section and the related party and risk sections and from questions that all investors warranted, in the subscription agreement that they had answered to their satisfaction. In effect each non-disclosure alleged by the sece was either admitted to have been disclosed by Mr Burnham, wmmas' sr vp H/R, and /or thru the Wmmae ppms so that the only reliance an investor could have was that based upon the wmma ppms that disclosed that wmma was a first stage startup ,losing money ,that the investor was making a speculative investment and the risk of loss loomed greatly in the Bespeaks caution section of the ppms.

The investors were not solicited by the interviewers as each employee wanting a job was not required to invest in the company which has led Judge Grimes to believe. The reason is that all sweat equity candidates were given stock warrants at the inside price so if Wmma made the projections the net warrant could have a value of one dollar value. This free warrant as a trade for a deferred salary until the companye made a profit. IT DEMONSTRATED NO NEED TO INVEST EXCEPT THAT WMMA HAD A FOREWARDe STOCK PURCHASE LOAN SECURED BY A PORTION OF THE SHARES THAT WERE ACQUIRED. The fundse were not accessible by the pension laws and the only access without a 50% penalty, was on a self-directed IRA. WMMA had engineered the way for a person to obtain their investment as a tax free loane paying interest each month until WMMA became profitable with no guarantees.e

That's the only difference from the sweat equity employment, so the investment was always at the employees request, as if the employee needed the cash flow until the company could fund the salary's; was by investing the pension funds and receiving the 2.5% until the company made a profit or until wmmas net worth was \$2,500,000.00 or until it ran out of business which was clearly disclaimed. Then the advances would automatically stop if the equity was reduced in half.

In addition, to the fact that the history demonstrates that WMMA sweat equity employees were 80% sweat that proved that WMMA was not running a bucket shop or looking for cash flow to support an extravagant life style. In fact the reconciliation of the Daspin loans and expense reimbursement and start expenses demonstrate that after crediting all authorized payments that Daspin netted \$25,000.00 for 30 months of fulltime effort. The books of WMMA also showed that the Daspin consulting firms provided Wmma \$3,000,000.00 of working capital deferred fees and/or forgiven fees and that the service contract limited MKMAs ability to receive earned fees by capping fee payments at no more than 10% of incremental equity and/ or 10% of pretax profit. So there was no way that wmma could be rendered insolvent by MKMA fee payments as the SEC disingenuously alleged.

Further the MKMA/WMMA contract provided WMMA the absolute right to toll all fee payments if such payment would adversely affect WMMAS financial position and to make matters better MKMA took a 66% fee haircut by modifying its service agreement on DEC8,2011 so that it could only receive a fee based on and equal to the highest WMMAS' employee payment for the year.

Thus the service contract was the reverse of the sec allegations that it was arranged to milk wmma and/or that the fees were so high that they could bankrupt the company. All these facts were clearly contradicted by the facts recited in the MKMA DEC 8,2011 modified agreement and in the Dec 15, EX A contract, an CE agreement which was assigned to MKMA in Jan 20,2011. Therefore the Sec is trying to keep the public in a whirl and really left with the following:

If all investors knew who Daspin was prior to investing and if all knew the financial condition of wmma was precarious and that any investment was speculative as the WMMA PPMs risk section makes clear, does the sec have a case that Daspin owes anyone disgorgement of fees which made Daspin the least paid person that the company hired based upon an average of \$1,000.00 per month after deducting all DASPIN fees and expense reimbursements of audited expenses with Larry Liux along on every trip as he was the CEO of WMMA

Does the SEC have a case if the WMMA PPMs did not disclose Daspins last name and/ or felony and or subsequent living wife with WMMA if the employment agreement every investor signed, was signed by Mr Daspin and his full name and if Mr Bernham advised all applicants as did Daspin and as declared for Byt 3 v the sec that declared the same disclosures before a federal bankruptcy court and where the exacting compliance discloses that all the investors knew before investing that Mr Daspin was at court and his wife owned warrants for a majority of WMMAH and/ or WMMAH and that Daspins' t fees were fully disclosed in the wmma ppm's and all the employment agreements' Daspin signed.

Does Mr Lockett and or Heisterkamp have a claim against Mr Daspin for reliance on Ms Puccios disclosure that she believed that WMMA was a Ponzie scheme in DEC of 2011 and did not share that with the aforementioned Investors, knowing that in March 2012 she invested \$100,000.00 in WMMAH1 and or a claim against Daspin for Wm Mac Farlane alleging he was not WMMAs' President when they both admitted that they saw Mc Farlane admit he was on TV and that WMMA has 3 signed contracts by him as WMMAS President?[That's the Chartis claim that both made as the fraud they relied upon.]

Does Sullivan, Berjedekian and Puccio have any claim against Daspin for investing In WMMA knowing that they were a consultant as disclosed by Main and Benham and as Mr Young advised Both Berjedekian and Puccio that Daspin was a felon ,that his wife had warrants from the 3 directors in WMMA and do any of them have a claim knowing prior to investing that Daspin was a consultant whose role for MKMAs was to Be its senior officer having the responsibilities outlined in thea employment agreements they signed and after having read the WMMA PPMs related party sectiona which discloses the CBI and MKMA massive contributions to WMMA and knowing Daspins' felony conviction which they admitted they knew up front whether or not either of them alleges that Daspin made no representations to them that the WMMA PPM ,they warranted in their subscription agreement they signed they advised them that no person was authorized to make any representations to them that were not in the July 31,2011 WMMAPPM and despite the WMMA ppm demonstrating that WMMA was a not start up ,losing money and no assurance it would ever make money and no assurance that there would have any money available to sellout the remainder of the subscription agreements?a Does anyone think that Daspin was unjustly accused of using Mr Mains' investment for his own financial gaina when it was disclosed shortly thereafter that the check payments were loan repayments made to Mr Daspin and that the Sec has documented the loans and can attest to the fact that WMMA, Sullivana Berjedekian, apology in writing and the hold harmless and indemnification for any causes of action rana from the beginning back to the beginning of time was given by them to Mr Daspin and to MKMA providea them a cause of action against Mr Daspin based upon their knowledge of Mr Daspin, background priora to his joining in Oct 2011 give them any cause of action against Mr Daspin.?

Another SEC allegation is that the IMC appraisal was inflated but the SEC can't prove that even ifa appraisal was accurate, even if they were correct ,which they are not; that any investor was injured as a result of an inflated appraisal dated before WMMAS indemnification and hold harmless and with thea understanding that they[All the investors except Lockett and Heisterkamp,] participated in the conversation concerning the appraisal and used the appraisal that they were heard agreeing that the appraisal was FAIR AND THAT AFTER THE CONVERSATION THEY INCLUDED THE APPRAISEL in THE Oct 31, 2011 FINANCIAL STATEMENT Gaap, UNAUDITED Compilation; the only investors that invested after the Imca appraisal were Lockett and Heisterkamp and both filed claims with Chartis with claims that had nothinga to do with the allegations about the IMC Balance sheet which was contained I the Jan 5th WMMAPPM anda with the financials were disclaimed within the ppms texta

Bear in mind that the Investors are both MBAs and accredited investors that warranted they had received all answers' to all their respective questions and were satisfied, which implies that if they had an immediate appraisal question that concerned them as the related party transactions demonstrated that IMC had an unswayable conflict of interest and that its N.J officer was a convicted felon which all investors knew. Are there any Investors that were injured by the reliance on the veracity of the non-GAAP compiled compilation appraisal and also bear in mind that Lockett visited IMC prior to his investment being deposited into the WMMA account and he is an expert Information technology Guru and he employed Beryl Wolk at the highest level.

IN addition one should bear in Mind that Mr Heisterkamph rushed to back date his subscription agreement as the divorce court had restrained him from using the pension funds he wanted to deprive his wife and the mother of his children from having so he used WMMA as the vehicle to remove his assets that were frozen by a court order Was he also the non-accredited investor that complained about a Puccio 'McFarlane' fraud as the reason he invested. Im sure he will not change that allegation as its cost him a fortune to file a trumped up insurance claim AND WHEN THAT DOESN'T WORK file a new claim for a settlement at the apple. IN addition Mr Heisterkamph filed an unemployment claim in Michigan after he quit not showing up for work. The Administrative law judge found him a joint venture WMMAa partner and had fabricated a story that the advance forward redemption for the shares he alleged was the reason he was on a salary. Once WMMA showed the administrative judge the facts Mr Heisterkamph was turned down from any unemployment as the judge found that he hadn't been paid any wages and the checks were advances of his own investment and not as he alleged to the court.

In addition both Lockett and Heisterkamph were heard on the dishonest tape of 7/19/12 with Mr Lockett reflecting that .."well Push him [me] against the wall and say sorry kid but your in a tough spot we cant help you but if you work it out with McFarlane maybe we can do something like a real deal" After another admission by Lockett he sent Puccio an email, stating that "it was you who.." and he blamed Puccio for selling him on investing in WMMA and for forcing him to invest another \$100,000 in WMMA as he had exercised the one month option, to invest after he tried out WMMAa for a month before exercising WMMA's option for additional shares.. He admits in the email that Puccioa spoke about him trying to force me to sell WMMA on the cheap and that she had put him in a back door deal. During the time he started working he visited IMC praised the IMC database as he was to integrate the database with the to be designed WMMA interface he had in mind.

The next attack was the SEC's allegation that I was not visible in the WMMA PPMs after I had been asked to be a subcontractor by some of WMMA's board members and other officers including Dan... He informed me that if I was named as the consultant for WMMA the state boxinga commission and certain country corporations commissioners would not license WMMA due to mya... WMMA would not be able to obtain E and O insurance .In addition it was to mya... a... to receive income thru one CBI as it could be the subcontractor but In order to a... WMMA I had to give up 50% of the WMMA commissions by involving MKMA in the... .

3-16-09 AT (CIVIL)

Voicemail | Email | C

EMAIL

Check Mail | New | Edit & Resend | Forward | Print | Delete

To: [redacted] Subject: [redacted]

Sent: the tragic theft of my time and its diversion to non monetary strategic plan as the only option

Edit & Resend | Forward | Forward as Attachment | Print | Delete | Previous | Next

emdaspin2@optonline.net

Inbox (448)
Drafts (209)
Sent (1)
Bulk Mail
Trash (459)
Notes
Untitled
Untitled 1
Untitled 10
Untitled 11
Untitled 2
Untitled 3

Subject: the tragic theft of my time and its diversion to non monetary... A A Add Contact Options

From: "edwardbaspin" <emdaspin2@optonline.net>
Date: 09/10/18 09:52 AM
To: schieldsk@sec.gov, mshapanka@optonline.net

Attachment: Download

E M D...
PLEASE ATTACH TO APPENDIX
RE THEFT OF SERVICE/TIME

BEEN PERMANENTLY ON 2015 AND DESPITE THAT THEY CONTINUED ALLEGING WILLFULLY FRAUDULENT "FACTS", KNOWING BY PROTRACTING THE CASE THEY WERE ROBBERING MY TIME AND WITHOUT DUE PROCESS AUTHORIZING THEM TO TIME DIVERGING IT TOWARD THE AGENCY'S SIDE OF THE EQUATION FOR WHICH I'M FILING THE CLAIM FOR THE FOUR YEARS SPENT DEVELOPING, BY COERCION, THE STRATEGIC PLAN TO THE EXCLUSION OF MY OWN CONSULTING TIME SPENT ON BUSINESS OBJECTIVES. RESPECTFULLY, I REQUEST YOU PLEASE ATTACH TO MY APPENDIX PREVIOUSLY SUBMITTED ON 9/6/18

MR. FIELD

THE PARTIAL HISTORY OF FURTHER
DEPREVIATION OF DEFENDANTS TIME
W/O DUE PROCESS RIGHTS (CIVIL)
WHICH RESULTED IN THEFT OF TIME
THAT DEFEWDAINTS SOLE SERVICE
PRODUCT; BY OMISSIONS OF MATERIAL
FACTS FROM WELLS WHICH
DE FRAUDED THE COMMISSIONERS
& MYSELF TO VIOLATE MY CIVIL RIGHTS
ABSENT DUE PROCESS

RECEIVED

SEP 14 2018

OFFICE OF THE SECRETARY

Edward m Daspin 4 Pineveiwlane ,Boonton. NJ 07005

973-919-0070;emdaspin2@optonline.ne case3-16509 at THE COMMISSIONERS

Dear mr Fields;

Ladies and gentlemen I have looked at the rough projections and I'm glad to revise my earlier estimation of the Ombudsmen s' [CBI] teams staffing to handle 120 cases after review of a gross inhouse of 600 cases per year thought to be assigned inhouse by enforcement.

Of this amount it is projected that approximately 120 cases will result in either A No Bill and or 50/50 approved settlement,after a Judges hearing whithin60-90 days, the deal making of CBI, defendants' law firm and enforcement and the judges preliminary approval after the judge clears it with the commission and enforcements head. between CBIS' attorney and enforcement then submitted to the Commissioners for specific recommendations to agree it a chance .if there is no deal then the retired Judge Finalizes his adjudication after he has heard final arguments of the parties and after the Judge has heard the commissioners' ,render his decision.The economicimpact will beasumed to looklike the following;

4 TEAMS OF A LAWYERANDLEGAL SECRETARY TO HANDLE THE 120 CASES,HEAR THE Wells and full exculpatory and Brady an draft complaint and both sides Wells letter .Defendant and councils oral argument with questions answered under oath ,enforcements opposition in a confidential hearing as well.

Then the case manager[4 Corporate and /or securities lawyer]and 2 dealmakers' oversight[2 dealmakers and a additional corporate staff of the equivalent case assignment[1] and record keeping filing officer with 1 secretary a [1]communicator AND ONE Secretary 2 dealmaker teams of \$2,000,000.00total plus the 4 teamsfor[for the entire ombudsmen=s staff to integrate each case so assigned, and serve as a facilitator that the entire system is providing the required tasks in a systematic and timely fashion and the target goal[s] of time ,performance and clarity is reached by the teams. There will be a Friday review by all 4 lawyers for the dealmakers' ,and legal stenographers. combined=\$2,000,000.00 gross with all perks insurance and or equivalent and employers contribution and or llcs for any individuals at their respective option independent contractors total gross =\$4,000000.00.[33,000.00 a case]The computer tracking and lottery assignments of each case, and a lottery of the projected 60 inhouse retired and commission approved federal and or state judges having securities experiences' and if there is a lack of communications a disgorgement back to an in house adjl by the chief judge.to the commissioners on all120 cases. and a record by the legal secretaries and on tape in the case files of each] .

Each Judge [3 teams with a legal stenographer will cost about \$1,150,000.00 or each team [with a case load of 25maximum cases for a combined total \$3,450,000.00 for 75cases=\$46,000.00a case of will be assigned a legal stenographer for the hearing of each case. Access to each case heard[approx..60-maxof 75 and if 50 cases 2teams for\$2,300,0000.00 tsking 60-90 days max with the hearing ,a settlement discussion anytime requested and at the end of the hearing before a preliminary finding. If No deal approved by enforcement , cbl and Defendant then the courts binding finding!. The defendants lawyer will ,as a precondition to obtain the ombudmens' advocacy of a "would be defendant's confidential proceeding agree and waive any rights and/ or protest ,it will be under the SEC rules and

subject to Commissioners' first right to appeal as in-house Adjl. waive his right to an inhouse Adjl[unless disgorged for not abiding by the advocates enforcement of the rules and is own code of ethics. as a prerequisite to a 50/50 or no bill or Adjl recommendation and prior thereto subject to the CFOMMISSIONERS APPROVQL of a no bill so that only 50/50 will be heard. if the confidential hearing by CBIS strategic plan must be accepted or its adjl time. Total cost comes out to \$83,000.00a case for a maximum 75 cases a year.

Extra staffing in each area on a prorated basis will be charge for additional persons. No discount except for the JUDGE team at \$1,150,000.00 a team will be reduced from the total which is \$46,000.00 a cases are less than 65 cases .CBI will be the bursar for the Stenographers and JUDGES and bill the SEC accordingly so the service will be turnkey

Costs for the 3 federal judge and or state court retired judge[preapproved at commencement of the program and a 3month phase in at the hourly rates to be reported. approved by the Commissioners]s will come to about and no more than 25 cases each, with one legal stenographer is \$500.00 per hour and stenographer cost of approx. 3 @\$150.00 an hour for \$600.00 A DAY=\$150,000.00annually PLUS THE JUDGE FOR THE 25 CASES' max of 50 for two teams.

CBI will house, at \$200,000.00a year, plus security the federal and or state court judges during the formal hearings and be reimbursed for offering its court rooms at a mini hearing 4 hearing room Staffed with receptionists, insurance, desks[recording systems and computers will be installed by the SEC, and telephone and conference room for the defense and enforcement and private rooms will be set up in a class A space[guarded for any theft and off site recording housing by UPS every evening before 7 pm by each judge and SEC and or off duty policemen for the remaining 16hours from the local police department ie PARSIPPANY N J. AND THESE COSTS WILL BE BILLED SEPERATLY] AND A 5YEAR LEASE FOR AN ADDITIONAL \$200,000.00 A YEAR. GUARENTEED BY THESE AND BILLED EACH MONTH WITH THE ADDITIONAL SECURITY GUARDS BILLED AT THE SAME TIME PLUS THE UTILITIES AND MUNICIPAL TAXES AND THE SEC AS NAMED INSURED WITH CBI , AND PAYMENT AND SEPARATE CHARGES.

No fraternizing with the judges by either enforcement, CBI and or defendants' law firms .THE JUDGES WILL REPORT TO THE COMMISSIONERS OR THEIR ASIGNSS IN EVENT OF SUCH CONDUCT REQUIREMENTS AS WELL AS ALL PRELIMINARY JUDGES ORDERS WHERE REQUIRE BY THE sec RULES OF CONDUCT..

A no conflict statement will be signed by each Judge and /or lawyer taking part and or participating in the case as well as dealmakers who will sign a confidentiality oath to ensure that none other than those the SEC authorizes discuss any aspect of each case and with a statement that any public companies business will no be used for any personal investments which as a precondition to assignment will be off limits and remain confidential for life.

To guarantee insurance the record keeping off site as well as onsite and Washington headquarters on site to interface with the Judges CASES YEAR \$1,000,000.00 for \$53,000.00 A CASE AVERAGE[also includes the rent and insurance not contained above in the \$79,000.00 AND PAID for the JUDGES and Stenographers housing as a contribution to the CBI overhead PARTICIPATES IN SETTLEMENT DISCUSSIONS AS PART OF ITS SERVICE;

CBI; 4 teams plus 2 dealmakers and 4 corporate officers for recordkeeping, lottery assignment's, communication/facilitators and Friday group meetings to vote on each case whether a NO BILL, 50/50 or Adjl recommendation. negotiating dealmakers in charge of the reporting to the commissioners prior to any initiation and to the NOBILL decisions and the 50/50 Commission approvals.

I felt that if CBI could cut corners for the 4 year program that would help this Commission for its decision and to allocate costs per case for the 120 projected cases. Stacked up against the Commission's costs to demonstrate value and included therein is the pension costs employer deductions won't be required as LLCs will be used except for corporate CBI costs. All Insurance is included and space for the JUDGEs is added on to approximate \$83,000.00 or up to 75 cases a year. We hope to save on average 100 cases a year from the ADJLS and innocent defendants will have their respective chance to prove it before litigation is publicized. The Commission has the right, but not the obligation to discuss its average time per case going down to an anticipated 13 months a case after factoring in 120 cases at months to the inhouse 18 month goal.

Respectfully



Edward M Daspin PRO SEE [THE PLAN]

CERTIFICATE OF SERVICE ON 9/11/18 AS SWORN BY ME ON THIS DAY TO DELIVERY TO UPS'-----

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

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

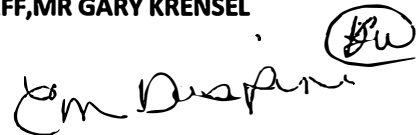
THE HONORABLE SPEAKER OF THE HOUSE, THE HONORABLE PAUL RYAN

MR FIELD OR THE COMMISSIONERS [3 COPIES]

MS, SCHIELDS [1 COPY FOR THE HONORABLE JUDGE BRENDA MURRAY;

THE HONORABLE JAMES GRIMES, THE HONORABLE CAROL FEOLAK

**MR MC GRATH, MR. KOLODNY, MR O CONNELL, MR SHAPANKA, MR AGOSTINI, MR LUX, MR L CHESTER
MAY FOR MKMA & ME FOR CBI, MR LUIGI AGOSTINI [CORPORATE STAFF, MR GARY KRENSEL
CORPORATE STAFF**





EDWARD M DASPINPRO SEE

4PINEVEIWLANE,BOONTON,N.J;07005

HARD COPY

973-919-0070;EMDASPIN2@OPTONLINE.NET CASE3-16509 AT & 3-16509 9/13/18

TO: THE COMMISSIONERS & JUDGE MURRAY

DECLARATION OF E.M.DASPIN, MOTIONS AND PRAYER FOR RELIEF

MOTION TO ADJOURN JUDGE MURRAY'S CASE SCHEDULE UNTIL VACATE MOTION HEARD. IF DENIED THE MOTION BY THE COMMISSION FOR \$1 MILLION IN FEES' NEEDS TO BE HEARD FOR THE COMPENSATORY DAMAGES CAUSED BY THE COMMISSIONS ERROR NOT APPOINTING ADJLS UNDER ARTICLE 2; AND THEN A MOTION TO THE CIRCUIT COURT TO APPEAL ANY DENIALS OF MY MOTION[S] TO THE COMMISSION.

BELOW GENERAL TOPICS IN BRACKETS; MOTIONS, DECLARATION AND BRIEF AS WELL AS CERTIFICATE OF SERVICE IS CONTAINED HEREIN AND THIS MOTION FOR ADJOURNMENT OF THE ADJL CASE UNTIL THE ABOVE IS HEARD AS WELL AS AN OUTLINE OF THE PROJECTED SAVINGS TO THE AGENCY AS A \$90 MILLION PER ANNUM SAVINGS, AND ELIMINATION OF 100 SEC INHOUSE DEFENDANTS' ATTRIBUTABLE TO THE SECS IMPLEMENTATION OF MY ACTION PLAN AND REQUEST OF A 15% WHISTLBLOWER FEE:

[Motion for return of 2300 Bates documents; and extend any action until I am given the restoration of the one million dollars insurance I wasted in my wasted defense; motion to adjourn any case activity until the commission rules on the vacate motion, the damages for theft of my time motion; or a consulting contract gave me if motion to vacate before the Commissioners' is not heard; and if the Commissioners' do not respond prior to Judge Murray's deadline of case commencement [unless adjourned] by Judge Murray, if commission won't take that PART of my motion to provide me the defense fees'. I will then request that the court grant me the time I need to be heard by a federal circuit court as without a law firm I cannot defend myself due to my incapacity to have the time as my wife is a



FIELD'S COMPLETELY INNOCENT OF THE BOGUS COMPLAINTS ALLEGATIONS AS SPECIFICALLY DESCRIBED IN THE SUBMISSIONS I COPIED JUDGE MURRAY ON TO THE COMMISSIONERS' INCLUDING THIS ONE. IF THE MOTIONS I SUBMITTED TO THE COMMISSION ARE DENIED]

Dear MR FIELD & Ms. Schield ;

I declare under the penalty and under the constitution that the below declared facts are true; under the laws of the United States. I understand that if any facts stated by me below are purposely false and that I am subject to punishment. Any allegations spoken below are on information and belief and not stated as fact, as referenced therein [OIB]].

1] I have been served by an order made by the Honorable Brenda Murray, chief judge of the inhouse court as well as an order by the Commissioners with respect to the supreme courts' notice as in DeLucia.

2)I have written to both the above persons and asked them to combine their efforts, at their sole option and to advise me of what portion[s] of the motion[s] I have made each will play, in what order played and further that any orders with respect to the above be given sequentially to enable me the time to respond to the Commissioners' first and then Judge Murray second. I ask that this be followed as my time is limited by the new duties my wifes' illness imposes and demands' on me and because I do not want to be defaulted by either of the above persons

3)' Pease indicate by order , letter or otherwise exactly how the motions ive' made collectively and individually, will be handled and allowing me time to respond and to lengthen the time for response by me until my time permits me to answer, albeit on a delayed reaction time so that im' there, with and for her as mandated by her illness. Such delays that im anticipating and apologizing up front . It cannot be avoided by me , as if they could, I WOULD NOT BE LATE. i apologize up front for any such delays and ask for your understanding. and that either of you will not default me for such if and when it occurs.

3)At the same time I also ask for a final order by you, with respect to the motion[s] that I have asked either or both of you to respond to .I cannot be held responsible for delays and I ;respectfully ask that you understand that my request is not one prompted by any strategic litigation plan as I do not want delays'; as such will plague my wifes ' application to refinance her home .

4)Absent enforcements' theft of my time and the concurrent civil rights violation, by prosecution of a made up and disingenuous WELLS letter allegations' ,[which they knew excluded material facts ;which had no omissions' been made ,they themselves would have eliminated the WELLS allegations' for cause; because the exculpatory evidence they had in their possession, and which they purposely withheld prior to the Wells submission demonstrated no need for a Wells letter, let alone initiation of a complaint!

5)The illegitimate Wells letter induced the Commissioners' to effectuate the complaint's initiation which also omitted the same material facts as the Wells ; that theft violated my civil rights'; in so taking that asset of value and the commission, at its option ,can retroactively provide me as a whistleblower against the purported benefits society gains yuse of any portion of the times byproduct, the plan, and in addition to the cost of \$2.800,000.00 for the approximate 8000 hours of my time as well as a whistleblower performance bonus of 25% of the savings that the plan generated and which was discounted by me tom15%; of the savings the SEC generates thru elimination of approximately 100 would be inhouse defendants per year out of100,randomly selected by the commissioners 'average monthly inhouse determined by enforcement; if a complaint is initiated at the rate of 10 cases a month, of which I project that 2/3 a month will be either note be initiated[A no bill]after CBI reviews the 10 cases in confidence and with the consent of the potential defendants' law firm, and which CBI will implement its plan on the Commission selected cases reserved by enforcement for inhouse if a case is ordered by the Commission and within 30 days', a CBI commission report for an estimated 2-3potential defendants' ;which CBI believes that from the 12 a month given 1-1.25 will receive NO BILL[10%] BY THE COMMISSIONERS; .5—1.125 will result in a non guilty bench trial hearingmof2nobilland or innocent out of 12 given for CBIS' initiative and with 10 given a complaint of which the enforcement results during 2013-2015 find 10% innocent and with the CBI initiative another17.5% in total.

The additional 17.5% found guilty added to the current inhouse innocence of 10% will give the inhouse CBI Innocent persons27.5%which is on a par with the federal district courts Sec averages for the 3years ending 2015 by the wsj!

6] [If the test on 20% of enforcements Wells finding for the first 6 months with the retired judge given another 90 day for his results to be added to the projected supports the projection than the estimated savings using 4 teams instead of the test using myself, a lawyer and secretary and computer assignment Secretary [Ms.] Shields. The person tasked with the over all operations of administration when the plan results prove out [no guarantees intended and/or implied], than should result in a gain of 17.5% more innocent would be defendants' than are currently being found guilty and with of the 500 annual in house defendants'; should reduce 87 persons a year from judged guilty than before the plans implementation and the cost of the plan, assuming the average defendant's cost of the agency is \$1,000,000.00 and the CBI initiative for the 100 cases going thru it is \$70,000.00 a person [of the 20% judged as having a CBI NOBILL LETTER [100 OF THE 500 CASES REVIEWED BY CBI RESULTING IN A 20% RECOMENDATION IT IS BELIEVED, that's a savings of \$930,000.00 a person and with 13 -25 cases judged guilty out of the 100 cases CBI found a preliminary NO BILL for. [as the commission is projected to grant a no bill outright on 10% and a bench 90 day hearing on 10% of which between 15-25% will be found guilty! The CBI initiatives cost of a **straight no bill** is \$32,000.00 allocating all of CBIS time to the 20% [100 cases for a no bill] and not charging any costs to the review of the 500 cases from whence the 20% were selected. On an allocation of 60% of the 4 teams cost for a review of the 500 case and a comprehensive report by each team of the 20% [100 persons] thought innocent then the report costs \$12,000.00 a case and the review of all the cases adds an additional \$20,000.00 per case for all cases.

7] **That effort provides great value because it ultimately sets 17.5 of the 500 "would be wells recommendations" FREE!** assuming half [50 cases] it goes to a bench trial by a retired federal/state court judge that cost is \$48,000.00 additional as the judge is \$500.00 an hour and the stenographer is \$200.00 an hour incrementally]. All overhead costs for the bench trial are included in CBIS' budget as segregation from enforcement is mandatory. So that there are no undue influences' and this reduction in the budget of the SEC in house agency can be offset by the enforcement bringing an additional 100 "would be guilty persons" reserved for inhouse and or assigning to the Adjl. 60% of the projected 1,000 cases a year while prosecuting 400 cases in federal district court. Enforcement will continue to require it full enforcement team. .in addition CBI cost provide a second look by 4 CBI dealmaker and a lawyer and a secretary so that the agency is giving each and every would be defendant the potential benefit of the doubt before any case is assigned to an Adjl. With that said an additional 100 cases can be given to the **ADJLS'** to substitute the and 87 more found innocent and the projected deletion from the 600 of those amount of 120 cases as CBI has the firepower to review 600 cases a year and take 120 for no bill/bench trials, based on the Commissions direction with enforcements' recommendation's already in the Wells submission; and with each case given CBI having the draft complaint, the brady the hard evidence to support the allegations'. Assuming that the CBI 4 teams' review 600 cases [30 per year per 3 man/woman team] and reports on each with 20% [+/_] a full report **recommending a no Bill**; of which the commission grants half [60] as being correct and 60 for bench] from the 120 cases.

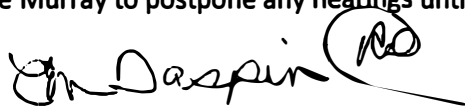
8] Going back to my case I have asked the **Commission by motion** to grant me a reimbursement of the One Million I lost in insurable coverage if the Commission believe this case should proceed. The basis is very strong as this defendant's litigation fund was wasted attributable to the Commissions error and not this defendant. In addition to my claim as above stated as well as my strategic litigation plan. My company paid for the Insurance aif not vacated I need the defense. The pace inhouse is to fast for me to keep up. I therefore need a law firm especially with Joan getting worse each month and requiring more time. Her sleep walking gets me up at night causing e no sleep some lights and so i must slap during the

day when that happens while keeping one eye open for her. I need a special calendar that is more flexible even when I get a lawyer At 80 and not well myself I cant keep up with the stress as its personal .If I get tht whistleblower contract ill be able to afford a live in an can donate full time tommy strategic plan.

9]As a result I ask for postponement until the Commission decides my motions' .If the Commission does not want to pay for the value of the theft that enforcement stole from me than I will ask for final order so I can appeal to arrive t meaningful review on the money and on the damages and violation of my rights by theft of my time. If they vacate than there are no issues for Judge Murray.

Therefore I ask Judge Murray to postpone any hearings until the Commission rules.

Respectfully



E M Daspin Pro SEE

CERTIFICATE OF SERVICE ON 9/14/18 I SERVICED UPS TO REMIT THIS SERVICE EDWARD M DASPIN——

THE PRESIDENT OF THE UNITED STATES. THE HONORABLE DONALD J TRUMP

THE VICE PRESIDENT OF THE UNITED STATES THE HONORABLE MICHAEL PENCE

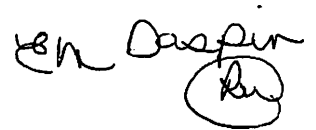
THE HONORABLE SPEAKER OF THE HOUSE, PAUL RYAN

MR FIELD OR THE COMMISSIONERS (3 COPIES)

MS SHIELDS (1 COPY FOR THE JUDGE BRENDA MURRAY;

THE HONORABLE JAMES GRIMES, THE HONORABLE CAROL FEOLAK

MR MCGRATH, MR KOLODNY, MR O'CONNELL, MR SHAPANKA, MR AGOSITINI, MR LUX, MR L CHESTER MAY FOR MKMA & ME FOR CBI, MR LUIGI AGOSTINI (CORPORATE STAFF, MR GARY KRENSEL CORPORATE STAFF)



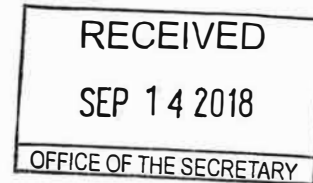
Rodriguez, Elvia

From: Shields, Kathy Moore
Sent: Friday, September 14, 2018 3:31 PM
To: Rodriguez, Elvia
Subject: FW: SCAN DASPIN 3-16509
Attachments: 20180914151041356.pdf; 20180914124448414.pdf; 20180914124344128.pdf; 20180914124316660.pdf; 20180914124250560.pdf

Follow Up Flag: Review/Act
Flag Status: Flagged

Received in OALJ

Thx



Kathy Moore Shields
Office of Administrative Law Judges
U.S. Securities & Exchange Commission
100 F Street NE, Mail Stop 2585
Washington, DC 20549
202-551-6030

From: The UPS Store #4650 [<mailto:store4650@theupsstore.com>]
Sent: Friday, September 14, 2018 3:23 PM
To: emdaspin2@optonline.net; lagostini@yahoo.com; lawrencelux@gmail.com; mshapanka@optonline.net; O'Connell, Barry; McGrath, Kevin; Kolodny, Nathaniel; Shields, Kathy Moore
Subject: SCAN