

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of

EDWARD M. DASPIN,
a/k/a "EDWARD (ED) MICHAEL,"

Respondent.

**DIVISION OF ENFORCEMENT'S PARTIAL OPPOSITION TO RESPONDENT'S
REQUESTS FOR A FREE HEARING TRANSCRIPT, EXHIBIT COPIES, AND
MORE TIME TO FILE A MOTION TO CORRECT MANIFEST ERRORS OF FACT**

The Division of Enforcement respectfully submits this partial opposition to Respondent Edward M. Daspin's ("Daspin") November 4 and December 4, 2019 submissions seeking (1) a free hearing transcript, (2) copies of the hearing exhibits, and (3) additional time to file a motion to correct purported manifest errors of fact in the Initial Decision. The Division opposes Daspin's motion for a free hearing transcript, given his months-long failure to file the required form; takes no position on whether he should receive free copies of the hearing exhibits; and opposes his untimely request for more time to file a motion to correct manifest errors of fact in the Initial Decision given his failure to identify any such errors. The Commission should deny Daspin's requests for a free hearing transcript and more time to file a motion to correct manifest errors, because his requests simply attempt to further delay the resolution of these proceedings.

I. RELEVANT PROCEDURAL HISTORY

On April 23, 2015, the Commission issued an order instituting proceedings ("OIP") in this matter. A first administrative law judge postponed the hearing indefinitely based on Daspin's

purported medical condition, a second administrative law judge scheduled a hearing and later found Daspin in default, and the Commission ultimately remanded this administrative proceeding for a new hearing following *Lucia v. SEC*, 138 S. Ct. 2044 (2018).¹ See Initial Decision at 2 n.2 (Oct. 16, 2019) (relating procedural history in more detail); Order (June 15, 2015).² In April and May 2019, Chief Administrative Law Judge Brenda P. Murray held the hearing. See Initial Decision at 2.

A. Daspin's Requests for a Free Hearing Transcript and Additional Copies of the Hearing Exhibits

On the morning the hearing began, the Division provided Daspin with a hard copy of the pre-marked hearing exhibits, labeled in a binder, which the Division intended to offer at the hearing. Declaration of Barry O'Connell dated December 11, 2019 submitted in support of this motion ("O'Connell Decl.") at ¶ 14. After the hearing concluded, the Division sent Daspin a thumb drive with electronic copies of its marked hearing exhibits. *Id.* at ¶ 15, Ex. L.³

The hearing concluded on May 15, 2019. See Post-Hearing Order (May 20, 2019). On June 12, 2019, Daspin submitted a motion requesting a free copy of the hearing transcript. See Order Denying Motion for Relief (June 14, 2019). On June 14, 2019, in response, Chief ALJ Murray directed him to an electronic copy of the Form D-A required to establish his indigence and permitted him to renew his request once he had filed a complete Form D-A. See *id.* On June 23, 2019, without filing a Form D-A, Daspin nevertheless renewed his motion requesting a free copy of the hearing transcript, and Chief ALJ Murray denied his motion. See Order Denying Motion for Transcript Copy (June 24, 2019). She concluded: "Daspin must establish that he is unable to pay to

¹ In his Initial Decision of Default, Administrative Law Judge James E. Grimes found, among other things, that Daspin had "concocted bogus medical claims to avoid a hearing on the merits" and "tried to fight his case by barraging [ALJ Grimes'] office with hundreds of e-mails." Initial Decision of Default as to Edward M. Daspin at 26 (Aug. 23, 2016).

² For documents that appear on the Commission's electronic docket for this case, the Division cites them here by their title and date only.

³ All references to "Ex. ___" refer to Exhibits to the O'Connell Decl.

receive a free copy of the transcript.... Daspin's motion is DENIED because he has failed to file a complete Form D-A." *Id.* She then attached a hard copy of the form to her order. *Id.*

On July 31, 2019, Daspin sent an email to the Office of the Secretary and the Division and made clear that he had sufficient funds to purchase the transcript himself. *See* O'Connell Decl. at ¶ 13, Ex. J ("I ALSO ASK FOR TIME TO OBTAIN THE TRANSCRIPT AS I FINALLY WASABLE TO GET THE FUNDS FOR IT" [*sic*]).

On October 16, 2019, Chief ALJ Murray issued the Initial Decision as to Daspin. Initial Decision. On November 4, 2019, the Office of Administrative Law Judges ("OALJ") received by UPS two submissions from Daspin requesting a free transcript of the hearing and indicating an intent to file a motion to correct manifest error of fact at some point in the future. O'Connell Decl. at ¶ 7, Ex. E.

On December 4, Daspin sent the OALJ an email, directed to the Commission, in which he appeared to again ask for a free copy of the hearing transcript (and a copy of the hearing exhibits) so that he could file a motion to correct manifest errors of fact. O'Connell Decl. at ¶ 10, Ex. G. That day, the Acting Chief Administrative Law Judge Carol Fox Foelak issued a Notice stating: "Because the time for motions to correct manifest errors of fact had expired by that date [November 4, 2019], an administrative law judge lacks the authority to consider the filings [referring to Daspin's November 4, 2019 filings]. Any future submissions should be directed to the Commission." Notice (Dec. 4, 2019).

Division counsel has never received a Form D-A from Daspin. O'Connell Decl. at ¶ 16. Nor does it appear that Daspin has ever filed a Form D-A in this matter, based on the Commission's electronic docket for the proceeding. *Id.*

**B. Daspin's Request for More Time
To File a Motion to Correct Manifest Error of Fact**

On October 22, 2019, six days after the Initial Decision was issued on October 16, Daspin emailed the OALJ and indicated that he had received an incomplete copy of the Initial Decision containing only the odd-numbered pages. O'Connell Decl. at ¶ 3, Ex. A. The OALJ emailed Daspin a hyperlink to the Initial Decision on the same day. *Id.* at ¶ 4, Ex. B. The following day, October 23, Daspin emailed the OALJ again and indicated that he had received an incomplete version of the Initial Decision. *Id.* at ¶ 5, Ex. C. On October 25, 2019, the OALJ received by UPS the first page of what appeared to be an email from Daspin, but it was unclear what the email portion pertained to. *Id.* at ¶ 6, Ex. D.

On November 6, 2019, the OALJ mailed Daspin a replacement copy of the Initial Decision. *Id.* at ¶ 8, Ex. F. Although the Division understands that the Office of the Secretary is still awaiting an official record confirming delivery of its mailing on November 6, 2019 to Daspin, Daspin stated in his December 4 email that he had received the replacement version of the Initial Decision on November 18, 2019. *Id.* at ¶¶ 9-10, Ex. G (email from Daspin dated Dec. 4, 2019) (“[O]n Monday, November 18, i [sic] received a letter certified from the US Postal Service. I did not sign for it, but accepted its delivery on November 18; ...[O]n November 18 i [sic] saw the SEC insignia on the brown manila envelope and knew it was only the replacement initial decision printed on both sides of each page.”). Daspin also states in a filing he sent to the Office of the Secretary on December 4, 2019 that he received the initial decision on November 18, 2019. *Id.* at ¶ 11, Ex. H.

On December 4, 2019, Daspin emailed his instant request for more time to file a motion to correct manifest errors of fact in the Initial Decision—49 days after Chief ALJ Murray issued the Initial Decision, 28 days after the OALJ mailed Daspin a replacement copy of the Initial Decision, and 16 days after the date by which Daspin admits he had received the complete Initial Decision. In his December 4 email, Daspin claims that he underwent a medical procedure on November 13 that

involved ██████████ and that he was placed on bed rest thereafter. O’Connell Decl. ¶ 10, Ex. G. Daspin’s email contains no mention or description of the purported manifest errors of fact he seeks to correct. *Id.*

Nor has Daspin filed a petition for review of the Initial Decision. O’Connell Decl. ¶ 17. Daspin’s time to file such a petition appears to have expired on November 27, 2019—21 days after the OALJ mailed the complete replacement copy of the Initial Decision to Daspin—under Commission Rules of Practice 410(b), 141(b), and 150(c) and (d) and the Initial Decision. 17 C.F.R. § 201.410(b) (requiring that any petition for review be filed “within such time after service of the initial decision as prescribed by the hearing officer...unless a party has filed a motion to correct an initial decision with the hearing officer”); Initial Decision at 57 (“A party may file a petition for review of this initial decision within twenty-one days after service of the initial decision.”); 17 C.F.R. § 201.141(b) (permitting service of written decisions issued by a hearing officer to be made by any method authorized under Commission Rule of Practice 150(c)(1)–(3), among other provisions); 17 C.F.R. § 201.150(c)(2) & (d) (permitting service by “U.S. Postal Service...first class, registered, or certified mail...addressed to the person” and making clear that “[s]ervice by mail is complete upon mailing”).

II. ARGUMENT

A. The Commission Should Deny Daspin’s Request for a Free Hearing Transcript.

Daspin’s December 4 request for a free transcript of the hearing should be denied because it appears to be nothing more than a further delay tactic, given Daspin’s continued failure to file the required form. On June 14, 2019, Chief ALJ Murray first instructed Daspin to fill out a Form D-A to establish that he met the indigence requirement to obtain a free transcript and repeated her instruction in a further order dated June 24, 2019. *See* Order Denying Motion for Relief (June 14, 2019); Order Denying Motion for Transcript Copy (June 24, 2019). Almost six months later,

Daspin has still failed to file a Form D-A and even conceded on July 31, 2019, that he had sufficient funds to pay for the transcript. O'Connell Decl. at ¶ 13, Ex. J. The Commission should therefore deny Daspin's request for a free hearing transcript.⁴

B. The Commission Should Deny Daspin's Request for Additional Time To File a Motion to Correct Manifest Errors of Fact.

Under Commission Rule of Practice 111(h), a respondent must file any motion to correct a manifest error of fact in an initial decision "within ten days of the initial decision." 17 C.F.R. § 201.111(h); *see also Russell C. Schalk, Jr.*, SEC Rel. No. 78253, 2016 WL 3627182, at *1 (July 7, 2016) (Order Requesting Add'l Briefs) (calculating that a *pro se* respondent's time to file a motion to correct a manifest error of fact expired ten days after issuance of the initial decision and permitting the respondent to file only specified "documentation not already in the record"). Daspin's time to file such a motion under Rule 111(h) expired on Monday, October 28, 2019, ten days after Chief ALJ Murray issued the Initial Decision. Daspin's request for more time to file a motion to correct manifest errors of fact—49 days after issuance of the Initial Decision—should be denied. Daspin's December 4 request does not even mention, let alone describe, the purported manifest errors of fact he seeks to correct and offers no basis for any such motion. Daspin's request appears to be yet another delay tactic in a record replete with such tactics. The Commission should promptly deny his request for additional time.

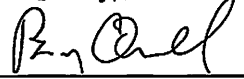
CONCLUSION

For the foregoing reasons, the Division respectfully requests that the Commission deny Daspin's December 4, 2019 requests for a free hearing transcript and additional time to file a motion to correct manifest errors of fact.

⁴ The Division takes no position on Daspin's request for free copies of the hearing exhibits.

Dated: December 11, 2019
New York, New York

Respectfully submitted,

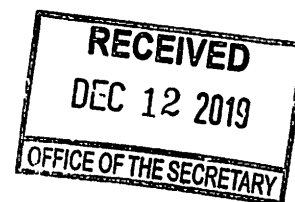


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ADMINISTRATIVE PROCEEDING

File No. 3-16509

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of

EDWARD M. DASPIN,
a/k/a "EDWARD (ED) MICHAEL,"

Respondent.

Declaration of Barry O'Connell

I, Barry O'Connell, hereby declare as follows:

1. I am employed by the United States Securities and Exchange Commission as a Senior Counsel in the Division of Enforcement. I have worked on the investigation and the litigation relating to the above-captioned Administrative Proceeding.
2. An Initial Decision as to Edward M. Daspin ("Daspin") was issued on October 16, 2019. *Edward M. Daspin*, Initial Decision Release No. 1387.
3. Attached hereto as Exhibit A is a true and correct copy of an email from Daspin to Kathy Moore Shields, in the Office of the Administrative Law Judges ("OALJ"), on October 22, 2019 indicating that he received an incomplete copy of the Initial Decision containing only the odd-numbered pages.
4. Attached hereto as Exhibit B is a true and correct copy of an email from Charles M. Woodworth to Senior Trial Counsel Kevin McGrath, Ms. Shields, and myself on November 5, 2019 indicating that the OALJ emailed Daspin a hyperlink to the Initial Decision on October 22, 2019.

5. Attached hereto as Exhibit C is a true and correct copy of an email from Daspin to Ms. Shields and Mr. McGrath, among others, on October 23, 2019 again indicating that he received an incomplete version of the Initial Decision.

6. Attached hereto as Exhibit D is a true and correct copy of an email from Ms. Shields to Mr. McGrath and myself on October 25, 2019 indicating that the OALJ received the first page of what appears to be an email from Daspin by UPS—which appears to be the first page of Exhibit C. There were no attachments to Exhibit D indicating what it pertained to.

7. Attached hereto as Exhibit E is a true and correct copy of an email from Ms. Shields to Mr. McGrath and myself on November 4, 2019 indicating that the OALJ received by UPS two submissions from Daspin on the same day, November 4, 2019. Included also in Exhibit E are the referenced submissions from Daspin which request a free transcript of the hearing and indicate an intent to file a motion to correct manifest error at some point in the future.

8. Attached hereto as Exhibit F is a true and correct copy of an email from Elvia Rodriguez, in the OALJ, to Mr. McGrath on November 8, 2019 indicating that she mailed Daspin additional hard copies of the Initial Decision on November 6, 2019.

9. Although the Office of the Secretary is still awaiting an official record confirming delivery of its mailing on November 6, 2019 to Daspin, confirming receipt, Senior Trial Counsel Kevin McGrath received a copy of the complete Initial Decision, by U.S. Postal Service certified mail, on November 12, 2019.

10. Attached hereto as Exhibit G is a true and correct copy of an email from Daspin to Ms. Shields and Mr. McGrath, among others, on December 4, 2019, which Daspin directs to the Commission, wherein Daspin claims to have undergone a medical procedure on November 13, 2019 and been placed on bed rest for three days and in which he also claims that he noticed mail correspondence from the Commission on November 18, 2019 that he “knew” contained the

complete version of the Initial Decision. In that submission, Daspin also requests a free copy of the trial transcripts and a set of the hearing exhibits so that he can prepare to file a motion to correct manifest error of fact.

11. Attached hereto as Exhibit H is a true and correct copy of a filing by Daspin to the Office of the Secretary wherein Daspin says he received the initial decision by certified mail on November 18, 2019.

12. Attached hereto as Exhibit I is a true and correct copy of a Notice issued on December 4, 2019 by Acting Chief Administrative Law Judge Carol Fox Foelak stating that: “Because the time for motions to correct manifest errors of fact had expired by that date [November 4, 2019], an administrative law judge lacks the authority to consider the filings [referring to Daspin’s November 4, 2019 filings]. Any future submissions should be directed to the Commission.” *Edward M. Daspin*, Notice Release No. 6714.

13. Attached hereto as Exhibit J is a true and correct copy of an email from Daspin to Ms. Shields, Mr. McGrath, myself, Thomas Charvelle, and Mr. Woodworth on July 31, 2019 wherein Daspin admits to having obtained funds to pay for the hearing transcript.

14. On the morning the hearing began, the Division staff provided Daspin with a hard copy of the pre-marked hearing exhibits, labeled in a binder, which the Division intended to offer at the hearing.

15. Attached hereto as Exhibit K is a true and correct copy of a cover letter reflecting the Division’s mailing to Daspin on June 12, 2019 by UPS a thumb drive with electronic copies of its marked hearing exhibits.

16. The Division counsel has never received a Form D-A from Daspin, nor does it appear that Daspin has ever filed a Form D-A in this matter, based on the Commission’s electronic docket for the proceeding.

17. The Division counsel has not received a petition for review of the Initial Decision from Daspin.

Dated: December 11, 2019
New York, New York

Respectfully submitted,



Barry O'Connell
Senior Counsel
Securities and Exchange Commission
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New York, New York 10281-1022
Ph: (212) 336-9089
oconnellb@sec.gov

EX. A

McGrath, Kevin

From: DASPIN [REDACTED]@optonline.net>
Sent: Tuesday, October 22, 2019 2:12 PM
To: Shields, Kathy Moore; McGrath, Kevin; [REDACTED]@optonline.net
Cc: store4650@theupsstore.com
Subject: i received an incomplete finding of fact its 28 pages someone must have not copied the rears side all i received is the odd pages.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please certify mail service of the entire order I'll send what I received back with a initial or preliminary answer of the manifest errors of fact in half the initial decision also please send a copy to Mr Field so for got his first name would you send it to me kathy? ;

thanks ed michal

EX. B

From: Woodworth, Charles
To: Shields, Kathy Moore; McGrath, Kevin
Cc: O'Connell, Barry
Subject: RE: i receivedanincompletinitilfindingoffactits28pages someone must have not copied the reerssise alli reveivedid the oddpages.
Date: Tuesday, November 05, 2019 11:14:33 AM

Mr. McGrath:

We also emailed Mr. Daspin a link to the ID on October 22, 2019, after he first complained about receiving only the odd pages.

Charles

Charles M. Woodworth
U.S. Securities and Exchange Commission
(202) 551-5894

From: Shields, Kathy Moore <ShieldsK@SEC.GOV>
Sent: Tuesday, November 05, 2019 11:03 AM
To: McGrath, Kevin <McGrathK@SEC.GOV>
Cc: Woodworth, Charles <woodworthc@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>
Subject: FW: i receivedanincompletinitilfindingoffactits28pages someone must have not copied the reerssise alli reveivedid the oddpages.

Try Elvia Rodriquez in OS or Margaret Baldwin or both. They are the APTS people in that office. I did ask that they resend ID to both parties and re-fax to Respondent at that time.
Thank you.

From: McGrath, Kevin <McGrathK@SEC.GOV>
Sent: Tuesday, October 22, 2019 4:11 PM
To: Shields, Kathy Moore <ShieldsK@SEC.GOV>
Subject: FW: i receivedanincompletinitilfindingoffactits28pages someone must have not copied the reerssise alli reveivedid the oddpages.

Kathy: Just fyi, I just received my hard copy on the Initial Decision in the mail and it was also missing all the alternate (i.e. even numbered) pages.

Kevin

From: DASPIN [REDACTED]@optonline.net>
Sent: Tuesday, October 22, 2019 2:12 PM
To: Shields, Kathy Moore <ShieldsK@SEC.GOV>; McGrath, Kevin <McGrathK@SEC.GOV>; [REDACTED]@optonline.net
Cc: store4650@theupsstore.com
Subject: i receivedanincompletinitilfindingoffactits28pages someone must have not copied the reerssise

alli reveivedid theoddpages.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please certify mail service of the enetre order ill send what i received back with a initial or preliminary answer of the manifest errors of fact in half the initial decision also please send acopy t o Mr field so for got his first name would you send it to me kathy? ;

thanks ed michal

EX. C

From: DASPIN
To: shieldsk@sec.com; store4650@theupsstore.com; [REDACTED]@optonline.net; [REDACTED]@optonline.net; McGrath, Kevin
Subject: please sign my name and email and overnight to Ms Shields and an extra copy for her to give Mr Fields for the commission at the same address as Ms Shields in Washington for Judge Murray email shieldsanemcGrath tonight signed with a certificate of service dated today and signed use myn...
Date: Wednesday, October 23, 2019 6:31:32 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms Shields and Mr Fields;

I received Judge Murray initial decision with only half the pages the odd numbered I sent it to you when I respond after I received a incomplete initial decision.

Please confirm you will send a complete initial decision and the documents then

I need the transcript withheld by Judge Murray when my wife refused to give me permission for her financials sent with my financials demonstrating [REDACTED].

In the odd pages all the courts findings of facts; contained manifest errors of fact[s] as a result of my not having the transcript to respond to the divisions' post hearing submission quoting the transcript; but omitting the cross answers and the exhibits I submitted to the court, Judge Murray must have not heard the admissions of the second witness to my cross examinations nor had she put it with my exhibits. It's not constitutional to force me to deliver my wife's financial against her will to be given the transcript of the hearing as I could not rebut the divisions' post hearing submissions! My wife and I as we file separate tax returns for over 50 years read my prior submissions. an underpaid.

Em DaspinPro see

EX. D

From: [Shields, Kathy Moore](#)
To: [McGrath, Kevin](#); [O'Connell, Barry](#)
Cc: [Woodworth, Charles](#)
Subject: RE: Daspin 3-16509
Date: Friday, October 25, 2019 12:16:40 PM
Attachments: [2019_10_25_12_14_45.pdf](#)

Same here.

Thanks.

Attached is all OALJ received today.

From: McGrath, Kevin <McGrathK@SEC.GOV>
Sent: Friday, October 25, 2019 12:12 PM
To: Shields, Kathy Moore <ShieldsK@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>
Cc: Woodworth, Charles <woodworthc@SEC.GOV>
Subject: RE: Daspin 3-16509

Kathy: We have not received any submission from Mr. Daspin by email or otherwise yet. If we do, I will email it to you and Charles as soon as we get it.

Thank you.

Kevin

From: Shields, Kathy Moore <ShieldsK@SEC.GOV>
Sent: Friday, October 25, 2019 12:04 PM
To: McGrath, Kevin <McGrathK@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>
Cc: Woodworth, Charles <woodworthc@SEC.GOV>
Subject: Daspin 3-16509

Hello,

The judge received part of what looks to be a petition for review (or manifest error) by UPS, but it is only the first page and contains nothing substantive. The email is addressed to me at: shieldsk@sec.com and so of course I did not receive it. It appears he sent it to the Division. If this is so, please forward Charles Woodworth and me.

Thank you.
Kathy Shields

↩ Reply ✓ 🗑 Delete 🚫 Junk 🚫 Block ...

Fwd: please sign mname and email and overnight to Ms Dheilds and anexrea copy for her to give Mr Fields for the commission at the same address as Ms Shields in Washington for Judge Murray email shields an emc Grath tonight signed with a certificate of service dated today and signed u...

ⓘ Getting too much email? Unsubscribe

D **DASPIN**
Thu 10/24/2019 10:23 AM
The UPS Store #4650 ✓

👍 ↩ ⏪ → ...

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

From: DASPIN [REDACTED]@optonline.net>
To: shieldsk@sec.com, store4650@theupsstore.com, [REDACTED]@optonline.net, [REDACTED]@optonline.net, mcgrathk@sec.gov
Date: October 23, 2019 at 6:30 PM
Subject: please sign mname and email and overnight to Ms Dheilds and anexrea copy for her to give Mr Fields for the commission at the same address as Ms Shields in Washington for Judge Murray email shields an emc Grath tonight signed with a certificate of service dated today and signed use my name and home address if you have time or just signed as my POW today

Dear Ms Shields and Mr Fields;

EX. E

From: Shields, Kathy Moore
To: McGrath, Kevin; O'Connell, Barry
Cc: Woodworth, Charles
Subject: Two Daspin filings 3-16509
Date: Monday, November 04, 2019 2:32:01 PM
Attachments: Manifest error filing 11-4-2019.pdf
Daspin filing of 11-4-2019.pdf

Rec'd by UPS in OALJ today.

Thx, Kathy

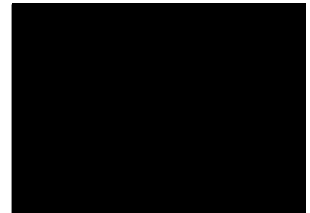
Edward m Daspin Pro See,

811

case-3-16509AT & case # 3-16509 10/29/1



Surficially



DECLARATION & MOTIONS; [BRIEF CONTAINED WITHIN] TO EXTEND THE TIME TO PROVE MANIFEST ERRORS OF FACT BY PROVIDING ME THE TRANSCRIPT OF THE HEARING PROCEEDING AND THE EXHIBITS ATTACHED AND REFERRED TO THERTO [I filed my financials' declared by me after and before my wife would not let me give her financial statements as part of form 20, i was deprived of defending myself, Im entitled by law to the same rights as other defendants' having [REDACTED] Equal treatment under the law has been denied to me from the start .

I make this final motion to dismiss for all the offense against my constitutional right enumerated by me; as I attach and make my submissions' to judge Murray a part hereof this motion and brief by referencing them herein below and as before cited to this court and now commission as well. Judge Murray, please give me the rights based on the record and as motioned herein and before your honor. In your honor, Judge Feolak finding of fact, that if I was forced to testify to testify I'd be irreparably harmed and not more true than now before your honor.

I took my life in my own hands by attending your hearing, to prove I'm not a malingeringer as Prelucia McGrath enterprise alleged to back up a default judgement voided by the U.S. Supreme court's August 2018 Lucia v the SEC findings' I They found that your honor, Judge Grimes and the other adjs' who participated in the Pre Lucia event their respective rights to hear cases by violation of the article 2, 2nd amendments' appointment clause and the intentions of their order was to eliminate any and all adjs' having participated in the Pre Lucia findings and having made findings against appeals made by me and the other 149 separate defendants' subjected to your honors willful premeditated violations' of the constitution supported by the enforcement divisions disregard for enforcement of the constitution; but apparently collaborating with your honors' violation of litigants' rights.

The record is replete with all my motions denied by your honor to protect the invasion Judge Grimes your honor all that were denied, You created the inhouse adjs, to look like they were part of your conspiracy with the division and their theft of my own and the rights of 150 other defendants that the U.S. Supreme court found were defrauded by their voiding all prior findings' against all of those defendants including myself, that appealed to the circuit court in their jurisdiction., Your honor did more than that against ME!

By your support of the divisions' fraud and conspiracy to defraud the federal district court judge, in New York city that I applied for a TRO restraining the division from filing a lawsuit inhouse against me; as I'd suffer [REDACTED] as one of your appointed judges found as fact I'd be irreparably harmed if forced to testify! The division opposed the TRO motion in the morning before they filed the complaint inhouse against me. By your honors facilitation of preappointing a judge once they bypassed the federal judge, your honor made that federal judge wrongly believe the divisions actions in my case were constitutional when all of the division and your honor knew what a waste of my recourse it would be all of you facilitated the theft by fraud and deception of my assets with premeditated willful conspiracy the theft intended by your honor with those under your command stole my 10,000 hours [My published consulting time is billed at \$350.00 an hour that all of you knew and you stole my litigation fund of one

million dollars eliminating my ability to be represented by lawyer of my choice on all by fraud, deception, diversion of my assets without due process and with more than 2 predicate acts of theft by fraud, deception without due process you caused me intentional infliction of emotional harm over 4 years in violation of the civil penalties thereof by your honor and the conspirators and enterprises that you, mcgrath and the other enterprise leaders are in debt to me as of now, informing the federal judge sitting in got-r emergency matters they committed the fact that none of the in-house judges were permitted to hear my case filed in houses all of the were at that time violators of the constitution your participation also informed the judge that your honor had already selected an in-house judge to preside over my hearing when that action facilitated the federal judge to believe that your honor was working under the constitution and that Dodd-Frank gave the division first right to select jurisdiction! BUT NOT TO SELECT A IN-HOUSE JURISDICTION WITH NO ADJLS PERMITTED TO HEAR MY CASE, THAT FRAUDULENT INDUCEMENT BY MCGRATH AS FACILITATED BY YOUR SIGNING VIOLATORS TO HEAR IN-HOUSE CASES COMMITTED THEFT OF MY 10,000 HOURS OF TIME, MY ONLY TITEL AT THE TIME AS IN A SEPARATE THAT BOTH COMMITTED WITH FRAUD AND DECEPTION YOU STOLE WITH JUDGE GRIMES AID AND ABETMENT MY \$1,000,000.00 LITIGATION FUND. I WAS ORDERED BY YOUR HONOR TO DEFEND IN THAT IN-HOUSE FRAUDULENT HEARING(S) YOUR HONOR PARTICIPATED AND IN FACT STEERED AND ORCHESTRATED THE MUSICAL JUDGE CHAIRS WHEN FAVORABLE FINDINGS FOR ME WERE RENDERED YOU FOUND ANOTHER SCHEDULING REASON & PRATT PERSON WHICH FACILITATED THE CONSPIRACY AND WAS A MEMBER OF THE MURRY ENTERPRISE THAT COMMITTED 150 PREDICTED ACTS IN 6 YEARS THAT I WAS FORCED TO DEFEND UNDER & TO USE MY DEFENSE FUND WHILE YOU, THE DIVISION AND JUDGE GRIMES WERE LAUGHING KNOWING THAT ALL THE LITIGATION FUNDS WERE GOING DOWN THE DRAIN AS THE CONSTITUTION PROVIDES A RETRAIL BY ANEW ADJLS PART OF THE DEFENDANTS' LITIGATION RIGHTS; BUT BY NO MEANS LIMITED THERE TO AS AGAINST THE INDIVIDUAL ENTERPRISE CONSPIRATORS THAT STOLE MY AND THE OTHER 150 DEFENDANT ASSETS BY FRAUD AND DECEPTION SUPPORTING THE DIVISIONS OMISSIONS OF MATERIAL FACTS; TO THE DISTRICT COURT JUDGE I SOUGHT THE TRUTH FROM & BY YOUR VIOLATION OF ALL MY CONSTITUTIONAL RIGHTS BY REFERENCE HEARING, I MAKE A PART OF AND ATTACHMENT OF THIS MOTION AND RECORD!

RECORDED SIF THEY WERE ATTACHED when you, with malice of forethought opened a road for the division to still defraud me by your participation in my case and my appeal to Judge Grimes cruel and inhumane treatment of forcing me to testify knowing that the fact found by Judge Feolak if he insisted on forcing me could harm me. Then when I was no longer in the hospital your honor again forced me to remain with him for his default against me while I could not attend the hearing due to my hospitalization, played musical judge chairs switching Judge Grimes to my case when I received a favorable finding from Judge Carol Feolaka she founded be irreparably harmed if forced to testify as fact.

I only appeared after a recusal request was denied and then to disprove the divisions pre Lucia allegation that I was a malingerer! The allegation that I was acting ill and was not really as my ill health records demonstrated.

In fact after your honor filed to provide your recusal and my motions for dismissal r ussing all factual proofs :I lost 7 of my material indispensable witness, to the 9 years old facts in the interim as this case slowly rolled along so at it was impossible for me to defend 9 year old facts without any lawyers' to defend myself, caused by the theft of your honors dissipation of my litigation fund of \$1,000,000.00 forcing me by fake orders, from fake judges as you weren't article 2 appointed either, on fake judges as was your

honor at that time! Time ravaged the respective lives on my witness, money by theft by fraud and deception without due process so i was forced to use only my cross examination of the SECS' witness, the fact that even the 2 lawyers' witnessed by the SEC McGraths efferal tomrCrigEaton EQ who the 27/12 e,qilmsPucclowrotetoNwuguguannouncing thenshe purched for\$500,000.00.89%ofWMMAH COMMONAND DISPLAYED THERONMR EATONSNAME ASONEOF THE WMMAH SHAREHOLDERSPROVED TO THECOURTSNDMCGRTH THATEATONFORGOTTHIS DEAL WITHWMMAS HE DINT GET THE SHARES FORTHINGBUT TO PROVIDECIRRRPORATESERVICES TOWMMAHAND SUBSIDIARYSAND THEN THE us TRUSTEE,MR GUARDINOOF THE WMMABANKCROPTCY FORGOT THE REONFOR HIS40.00ALLWMMAS ESETSONLIQUIDATION.IREMINDEDHIMTHTHEIMC CONTRCTWIH WMMASPECIFICLLYVOIDS THE CONTRCTINEVENT EITHERPARY FIESANINSOLVENCEYANDSO THE CONTRACT WAS OISANDNANSSET ATALLOFWMMAIHEAGREED THATMIGHT BE THE REASONAND WITHNO OTHEREXPLANATIONTHATSETTLED THE VALUATIN OF THE IMC DATABASES WHICH THE COMPLAINT STATED WAS VALULESS DESPITE MR Wolks' [deceased] BRADY STATING HE he was offered \$40 million for it many years before the internet had grown and MsPuccios valuation assuming the wmma/wdi combined oct11,211 current assets were eliminated by current deffered employee compensation then the only asset she judged worth \$500,000.00w.89%of the database value a that's all that was left pre chapter11.Thus confirming after eliminating 8% minority wmmad intersts an appraised value of \$100,000,000.00forimc while MKMA and i apprised it at the directives of wmma board to be used for the Texas boxing commission licence requirements to give wmma the right on3/31/1 to have the Wounded Warrior charitable event as M Sullivans' transmission attempt request to the WMMMA board requested he send it to the commissioners in Texas. In other words the Divisons' allegation the appraisal was done to perpetrate a fraud on unsuspecting investors' was a commissioner fraud perpetrated by the divison on those they reported to!! It was also contravened by Sullivans' attached requires that theWMMMA/WDI Board of directors[not me]give their permission[not mine!!!!] the appraisal was noted on the oct 31/11 combined WMMMA/WDI balance sheet{NOT TO BE RELIED ON FORINVESTMENT PURPOSES AND IN THE JAN 5TH, 2012PPM THE MKMA SEPARATE PARTY TRANSACTIONS' DEMONSTRATED MKMA HAS UNWAIVBLE CONFLICTS OF INTERESTS' IS A APREFERRED SHAREHLDER OF WMMMA AND WDI AND AS A CREDITOR OF EACH !! WHAT OTHER DISCLOSURES ARE MISSING??? THAT NWUGUGU FORGOT! I CANT THINK OF ANY INCLUDING CBIS' FORGIVENES OFA MILLION FEE[IT IN IT RAISING FLAG] AND THE WMMMA WUSA SUBSIDIARYS' NOV1, 2010 DRAFT PPM DEMONSTRING CBIIS' THE EXCLUSIVE MERCHANT DEALMAKING,ITS BANKER AND IM LISTED AS ITS CEO CHAIR. WICH RAISES MY FELONY FOR ALL IN ESTORS TO SEE DURING THE AVERAGE 2 MONTHS TO MAKE AN INFORMED INVESTMENT DECISION!!WHAT THE DIVISON DID TO THIS PRIOR COMMISSION IN THIS CASE IS UNFORGIVABLE AND DESERVES THE INSPECTOR GENERLS INVSTIGATION NOW!

Puccios' 3/27/12email to Nwugugu disclosing her \$500,000.00investment in WMMAH for .89 COMMON SHARES which was all the assets wmmah owned afternetting the subsidiarycashcontact receivables with the deffered compensation to employees after eliminating inter affiliate stock tranasctions and the 8%minority intersts owned by he wammh sharholdersrs is for the imc value prechapter11,its 20% greater than my and mkmas oct31/11balence sheert the divison complained our\$83 million apprise was lower than!!and in 5months\$17million increase demnstrates the internets user growth! So the WMMMA common shares subsequent evaluated in and by n arms length COO purchase demonstrated the fasity of the divisonsconvolutedthinking ie imilkedwmmawhenI vested 42,760,000.00whichnever received,I usec anakawhen edmichael is thenameivebeen cled for 81yearsby friends,I wrotetheppmswhenNwugugusCgartisclaimadmitshe wssmits100%authr,ichargeinvestmentbanking fees

by disguising the fees which were pseudonym for HR fees and vice versa when Nwugugu admits he completely created the service contract of both [not me] using the chamco contract 2006 for the wmma service contract and when federal Judge Theodor Alpert found me innocent of securities claims using the identical service contract. When Judge Gambreddella and her trustee [party at interest] found no wrong doing by me in wmma Res adjudicata in both federal judges re both securities claims and frauds NO SCIENTER! CHAMCO FEDERAL JUDGE WHICH NWUGUG ADMITS HE SOLELY PREPARED THE CHAMCO AND WMMA CONTRACT USING CHAMCO [SEE HIS RECANTION OIP ANSWERS] After 3 years Found me innocent! SEE HIS Wells reply, MY EX C FORMY WELLS EPLY SUBMISSION AND SEC 5, 5 AND 7 FOR THE NO SECURITIES VIOLATIONS' POSSIBLE AND NO CREDIBLE INVESTOR/OPERATORS IN OTHER JURISDICTIONS' AND THAT THE INVESTOR LIED [LIED] ABOUT ACCEDATION IN THE WMMA SUBSCRIPTION AGREEMENTS'

I had No investment banking license as none was required and there was non SEE EXA fee section of the wmma service contract for any investment banking fees and the hr fees were a percent of hr first years compensation or the greater of a base fee of \$25,000.00 with a cap than of 10% override of 1-% compensation they received regardless of compensation until the base of \$25,000.00 was made [just like any contract signed having nothing to do with compensation ; ie; a law firm, a consulting firm contract, a CPA firm contract etc. id is \$25,000.00 unless specified differently based on performance.

In other words the division with malice and forethought omitted all the material facts that they had prior to the well notice hispd from the commission in their WELLS NOTICE AND IS GROUNDS FOR A DISMISSAL AS HAD THEY NOT DEFRAUDED THE COMMISSION I WOULD NOT BE SUED. JUDGE MURRAY DENIED MY USE OF THAT WELLS REPLY AND NOTICE AND I SEEK A DISMISSAL AS SHE ERRED IN THAT ALONE!

Had they disclosed in the wells notice it would nullify and contravene the allegations used by the commission to initiate and action. Prosecutorial misconduct and fraud perpetrated on the trier of fact are dismissal grounds are grounds for dismissal of the complaint that flowed from the fraud & the fraudulent WELLS notice. Again I ask for a dismissal as Judge Murray refused to let me present it in evidence in the hearing [see the transcript] despite the fact i was 79, had no law firm attributable to that theft of my litigation fund that she perpetrated with the division and Judge Grimes deserve a dismissal as i was denied my constitutional rights to defend, forced to go to trial with a judge having gross manifest conflicts of interests refusing to recuse and or reply and answer the refusal of the division to answer my vacat motion which is an admission of the theft they made and the court as under a obligation to dismiss at that point to rectify the theft by herself and the division under mcGrath, instead she stuffed it side to side what she could to derail justice continue deceiving me conspiring with the division to deny me my funds to represent myself and then due to her and their theft deny me my constitutional rights to the transcript and exhibits to derail further my ability to defend myself. The courts act in fess in excuse in this matter the evidence that she admitted to fix cases brought in house against defendants that Judge Cameron Elliot, Former Judge Lilian McEwen, Judge Caro, Feolak will if subpoenaed all date that judge Murray was a big impediment to justice for defendants and sought to pressure judges to find for the prosecution on the basis that she actually believes we are all guilty because Dodd Frank gives the presumption of guilt which boxes in the commissioners as better alternative to permitting a potential guilty person to invade our brothers and sisters standard of living prefers to punt to the divisions they don't have the time to make a judicial review of the cases if they survive to spread over the 5 commissioners then 1,100 cases a year they need to receive the well notice and reply and case law of about 1,000 pages in the 8 hours they have every day for 4 days out of 5 days a week the rest of the time is spent eating

running their divisions', My structure gives free the commissioners 3500 man.woman hour including the federal retired Judge initial non binding, in camera opion in 30 (days after all wells documents and the division Brady and exculpatory deposition all are provided the ombudsmen) In this manner the commissioners can make and informed decision if they want to bet \$1-5million on A wells notice and that notice will improve for fear the omitted facts', like in my case, will prove that those division prosecutors' must not mar our Presidents halls of his SECs' justice!

There is no room for prosecutor fraud and fraud fraudulent inducement as well as a participation by several enterprises, which collectively violated an committed in 5years, 150 predicate acts of theft by fraud and deception with no due process; they even deprived me of the transcript violating the equal rights amendment under the law. The SEC rules do not dominate the comstitution so that Judge Murrays denial to me not only violated my right but I could not respond to the divisions' post hearing submissions so I only continued whinning about the fraud perpetrated against me and those other 150 victims that Judge murray best on all of US!! there is no requirement for awlfe making separate financial tax returns for 50 years to be used by the court to deny me of my right under the law to receive the same rights others of my class received denied me my litigant rights,

Again my motions for dismissal divison, on the WMMA chapter 11 trustee, Mr Galvano, the judges trustee, forgot the reason that he valued the debtors liquidation assets at \$0.00 The transcript review will prove that I lost about 40% of the witness statement as im hearing impaired and the court acoustic devices muffled the sound so that this court yelled as the witness stated and did not want to embarrass this court as you were trying to help me and if led you to continue to repeat this courts statement to speed up my part of the case.

I mean all 7 of my indispensable witness were dead and stroke victims so I was my only witness I was not given equal time to put on my witness I was the only one as all my died et al, You gave the Prosecution 8 days and me 4 hours! I wanted to use my wells reply and comment based on what we learned the sec witness admitted in cross to prove that im not the guy they should have gone after, Craig, Mr mcFarlane, Jereyil, Main as they controlled the no audited by me to audit the even as the budget and projection I saw showed \$600,000.00 cash receipts for tickets in house and inventory before any advertizers and pay for view!! He emailed me not to audit as hecos from mcGladdery was quoted at \$20,000.00! To protect \$600,000.00! a \$20,000.00 to protect the \$600,000.00! He let them and his son steal! His son was at the event for 4 days before it occurred with the aforementioned! It was too expensive, What was he an idiot savant or was he part of the macFalanene enterprise an we know from the dishonest shareholder meeting he was! He helped them launder the live gate!

My hearing defense was going to use the wells reply but your honer stopped me in 4 hours! You cut my defense time 4 hours as you wanted to go back to ; Washignton but gave my adversary's 8 days!

No witness, 81, the time to long as 9 years ago, mr Lux after 9 years acrtually double crossed his truthful 2013 deposition, McGrath suborned his perjury!! Look this 2013 deposition ie: Nwugugu wrote the lion share and he never saw mr Daspin type: now 9 years after the 2012-2011 heremember idicated it to Young when his office was sepertrd and by 5 doors so ic-doak and 4 offices out of sight and hearing, This was rigged case and he said fixed witness Hn eO was a f.....g lor!

There was no justice in my case only angst, there was no compassion for the denials the court permitted against me as the court knew what was coming and that's why it chose to trust Cameron Elliot or

Judge Feolak to jeopardize them as that the division created and which your honor refused to permit despite the division defrauded the prior commissioners,, Your honor is brilliant and a task master suited to find guilt but unsuited for justice, Judge Grimes is of the same persuasion and that's why the Presidents' son in law got out of the profession as it sickened him what it did to his father and me like me, President Trump will right the ship as long as we get him another term as no one in 4 years with a house so biased and on such a with chunt that they have the balls to try to impeach a guy whose giving us his life, I see him aged and he is one strongman but we must give him the tight to finish why we voted for him and give the demonstrates out of the house of representatives A backlash will come of that I'm sure against those they try to unseat the greatest President this country ever had,

, Your honor forgot the transcript will clear up the manifest errors ;but is it really necessary as we both know I was denied my constitutional rights, best by your honor and McGraths and your honor admitted on the record that you perceive me as an enemy ;it on the transcript! and that's why you let me object! how can a judge who admits an adversary conflict ever provide anyone an unbiased opinion???, I regret the manifest errors It is in the transcript; but your refusal to give it to and exhibits me to defend myself requires a motion to your honor again as I hear with appeal on the transcript and exhibits as I can defend and prove manifest errors without it ?? I don't have the financial strength to pay for it as my declaration and financial prove, to give it to me & a 20 day extension with that subject to the commission granting me and extension for rule 111 review or they can accept this as my appeal on this discrete motion if your honor refuses to grant it with the extensions requested.?

It's a start and I enclose my off page and certified receipt when I received the certified office is to office letter for the initial decision as they must have left it in the mail and Joan got to it before me as I found it on ter [10.22.19, not including the full even pages so it was no good!! Anyway! The odd pages I enclose it for you to weigh the enclosed page as proof it was incomplete from the start, I have not received an be copy as of yet and I had asked that I personally sign all noticed to me because of Joans condition!

I motion the commission to extend me a start, commission additional 10 days after your grants nts the motion or denies it and then I file this as my appeal on that issue before I can responds to the manifest error. honor form 20 which required me to provide my wifes independant financial statements is unconstitutional as she refused to give me them and our tax statements are separated for 50 years independant of each others and as its her right as her privilege despite her [REDACTED] and I need the extra 10 days as I'm beset as her primary caregiver with emergencies she created every day!! we will finish together. Respectfully

E. M. Gospin, Prosec

cc McGrath, Mr Fields, Ms Shields by email and hardcopy for Mr Feilds in Washington and Ms Shields for the commission and for the Judge Murray

Separate notice to the President of the United States for Permission to name the Ombudsmen's New rule in the SEC proceeding s precomplaint initiation to due process before Dodd Frank Commences so this Commissioner will receive meaningful judicial review nonbinding in camera so before the complaint is initiated so that the commissioners are not hamstrung by only having 8 hours per case forcing them to punt while the 33% innocent defendants' reputations' are not smeared.

Edward m Daspin pro see,

case-3-16509 & case # 3-16509AT 1/11/19 flrs

[REDACTED]

[REDACTED]@optonline.net [REDACTED]

DECLARATION[s] & MOTIONS AND BRIEF FOR THE FOLLOWING VIOLATIONS OF MY LITIGANTS RIGHTS, MY CONSTITUTIONAL RIGHTS' & ME TO RECEIVE EQUAL TREATMENTS UNDER THE LAW, AS WELL AS ALL OTHER RIGHTS' REFERRED TO HEARIN BELOW I MOTIONED BEFORE AS BY REFERENCE TO THEM ITS; AS IF ATTACHED HEARIN THAT I DID NOT RECEIVE A RESPONSE ANIR THAT YOUR HOOR ENIED BEFORE AND I ASK THAT YOU REVISIT IT. I HAVENOT RECEIVED THE FULL INITIAL DECISION AND SO I MAULING IT AS AN ATTACHEMENT TO THIS AND THE ATTACHED DECLARATION AND BRIEF WITH THE HOPE WE CAN RESOLVE THEM. I MANIFEST ERRORS IN THE ODPAGES AND MY EXIST IN THE EVEN PAGES I ALO MOTION FOR THE TRANSCRIPTS AND EXHIBITS AT NO COST AS MY WIFE HAS A RIGHT UNDER SPOUSAL PRIVILEGE TO DENY ME ACCESS. THAT DOES NOT MEAN THAT THE SEC HAS THE RIGHT TO INSTITUTE FORM 20AS A CONDITION PRECEDENT TO GIVING ME WHAT I AM ENTITLED TO BY LAW UNDER EQUAL TREATMENT UNDER THE LAW, ..

THIS COURT & COMMISSION WILL OBSERVE IN THE RECORD OF THIS MATTER, THAT I DON'T DESERVE TO BE FOUND GUILTY OF ANY VIOLATIONS OF THE LAW, NOR WAS I GUILTY OF VIOLATING ANY LAW OF THE UNITED STATES WITH SCIENTER. TO ENSURE THAT EVERY INVESTOR KNEW BEFORE INVESTING AS ADMITTED IN THE COMPLAINT INDEPENDENT OF MR. YOUNG TESTIMONY THE SIGNIFICANCE OF THE UNSOLICITED ADMISSION PROVES MY HONESTY AS DOES THE FACT THAT INSTEAD OF MILKING WMMA ACCUSED IN THE WELLS NOTICE I WAS A CREDITOR GIVING IT OVER \$2,760,000.00 A CREDIT THAT I NEVER RECEIVED PAYMENT FOR AND WHICH THE WMMA/MKMA CONTRACT GIVE WMMA THE RIGHT NEVER TO PAY. THAT IS NOT ME MILKING AND I WAS MILKED A MR BEIRS, THE SEC FRAUD AUDITOR FOUND NO FRAUD BY ME WAS COMMITTED RATHER THAN ALL WE RECEIVED VER 9 MONTHS IECBI, NKMA AND ME WAS \$240,000.00 WHICH WAS THE SERVICE AGREEMENT CONTRACTUAL OBLIGATION AND I FORGIVE MILLION FEE, DESPITE THE WELLS' NOTICE NOT GIVING THE COMMISSIONERS' THE TRUTH THAT THE DIVISION HAD IN HAND FROM 2012 SUBPEONA AND FROM THE 2013 LARRY LUX DEPOSITION ATTESTING TO THE FACT THAT HE, NOT I WAS THE CEO, THAT HE WANTED TO FIRE ME AND MKMA; BUT DID NOT THINK HE WOULD GET THE PERMISSION OF THE OTHER 2 WMMA DIRECTORS WHICH PROVES THAT THEY WERE INDEPENDENT AND CONTROLLED ME AND NOT AS YOUR HONOR FOUND I

THE DIVISION DID NOT GIVE THE COMMISSION THE WMMA CHAPTER 11 FRAUDULENT DECLARATIONS OF HALF THE INVESTORS NOR DID THE DIVISION GIVE THEM THE [COMMISSIONERS THE FACTS] THAT THE SEC ADMITTED THAT THE OTHER 3 INVESTORS LIED IN THEIR SUBSCRIPTION AGREEMENTS FOR A 100% FRAUD BATTING AVERAGE THAT ALL INVESTORS OATHS CANNOT BE TRUSTED.

IN ADDITION; THE ONLY REASON THAT THERE IS A SECURITIES CLAIM IS THAT THE INVESTORS WERE NOT ACCREDITED AND THAT THE EXCHANGE ACT WAS VIOLATED BY MY DISGUISED THE INVESTMENT BANKING FEES ALLEGED TO BE DISGUISED BY ME AS HUMAN RESOURCES FEES. [MR. N. W. GUGU] ACCEPTED FULL RESPONSIBILITIES IN HIS OWN ANSWERS AS PART OF HIS RECANTATION OF HIS BRAY ALLEGATIONS WHICH HE REPRESENTED WERE NOT HIS AND HE THEN ANSWERED ALL OTHER ALLEGATIONS AS IF A DEFENDANT, IN IT HE ADMITS HE USED THE CHAMCO SERVICE AGREEMENT AND EXAS THE TEMPLATE FOR THE WQ WMMA SERVICE AGREEMENT WITH NMKMA AND THAT I

DID NOT TOUGH IT AND THAT IT WAS AN EXACT REPLIC SO I WAS EXCULPATED BY HIM DESPITE HIS CLAIMS IN THE CHARTIS CLAIM THAT I WAS RESPONSIBLE FOR HIM NOT GETTING PAID WMMAS PERCENTAGE FEES THAT MKMA HAD AGREED TO DISCOUNT AND THEREFORE HE PROVED THAT I DID NOT DISGUISE THE INVESTMENT BANKING FEES AS THERE WERE NON IN THE CONTRCT AND 5 OF THE SEC WITNESS ADMITTED THE HR FEES WERE PERCENTAGE OF THE FIRST YEARS COMPENSATION AND NOT THE AMOUNT OF INVESTMENT!! ITS IN THE WELLS REPLY SUBMISSION WHICH YOUR HONOR REFUSED TO LOOK AT AS MY EXHIBIT TO DEFEND MYSELF PLEASE LOOK AT IT NOW AS I WAS FOUND BY THE WMMABANKRUPTCY COURT TO HAVE COMMITTED NO WRONG DOING AND IN 2014 AFTER THE COMPANY WAS SHUT THAT'S RES ADJUDICATA IN A FEDERAL JUDGE COURT AS AN OPINION BY THE TRUSTEE AND THE COURTS DISMISSAL OF THE CHAPTER 11 GIVING ME BACK THE COMPANY AND FINDING THE 4 WMMMA OFFICERS' NON CREDIBLE, I ASKED YOUR HONOR TO REVEIW THE WMMMA CHAPTER 11 DECLARATIONS OF MAIN, BERJEDEJIAN SULLIVAN AND MY REPLY AND THE TRUSTEES OPINION.

THAT PROVES NO SCIENTER ON MY PART WITH RESPECT TO THE HR FEES BEING DISGUISED AS INVESTMENT BANKING FEES AND ON A FIFO BASIS ALL THE \$240,000.00 OVER 30 MONTHS FOR \$8,000.00 A MONTH AND THE HOURLY RATES FOR THE FIRST 4 MONTH OF JAN-APRIL 2011, BEFORE ANY HUMAN RECSOURCE FEES WERE DUE. THE HOURS \$RATE OF \$350.00 AN HOUR IN THE CONTRACT WERE DEFERRED FOR THOSE MONTHS' AND TO BE PAID FROM FIRST CASH ; BUT MR BURNHAM WAS PAID FOR THE H/R FEE AS HE WASNT AN HOURLY WORKER SO MR AGOSTINI FOUND IT CONVEINENT NOT TO HAVE A RUNNING TOTAL AND KEEP 2 SETS OF BOOKS ONE FOR DEFFEED MKMA FEES AND THE OTHER FOR BURNHAM WMMAS SR VO H.R FOR HR FEES WERE THEY INVESTMENT BANING FEES THEN BIRNHAM WOULD HAVE BEEN SUED, HE WASNT SUED AND HIS BRADY PROVES ALL INVESTORS WERE TOLD BY HIM, PRIOR TO INVESTING THAT MY WIFE OWNED A MAJORITY OF WMMMA 11 [THE TRANSCRIPER USED WMMMA AND WARRANT MY WIFE OWNED IN WMMMAH BY ERROR BY ERROR AS MR NWUGUUGS' RECANATATION & LAWYERS' LETTER ALSO ALLEGED PROSECUTOR FRAUD IN THE BRADY TRANSLATION!

PAYMENTS OF WHEN THE INVESTORS INVESTED FOR BURNHAM WERE FOR H/R FEES, BUT FOR MKMA WERE FIRST DEFERRED HOURLY FEES AS NO INVESTORS INVESTED BEFORE SEPTEMBER 2011 AND MR AGOSTINI SAVED THE ACCRUED PAYABLES DUE MKMA, WE NEVER RECEIVED ANY H R FEE SO THERE WAS NO INVESTMENT BANKING FEES EVENT I THOUGH THE ' ALLEGATION IS IN ITSELF WERE AN ABUSE OF DISCRETION DEMONSTRATING JUDGE MURRAY HAD TOO MUCH ON HER PLATE AND THAT'S WHY I WILL PROVIDE THE MANIFEST ERRORS WHEN IM GIVEN THE TRANSCRIPT.

THE ENTIRE ALLEGATION IS A RUSE TO FIND ME GUILTY OF THE EXCHANGE ACT THEY HAD TO FIND AN INVESTMENT BANKING FEES IN THE FEE AGREEMENTS; BUT THERE WAS NONE SO THEY INVENTED IT! JUDGE MURRAY WAS NOT INFORMED BY ME; YET AS THAT'S WHY WE ARE HAVING THIS EXERCISE, I INVOLVED TO TRY TO GRASP AT STRAWS TO FIND GUILT WHEN THE COMMISSIONERS' ONLY INITATED A COMPLAINT BECAUSE THEY BELIEVE THEIR DIVISION BUT THAT'S THE PROBLEM AS THE PROSECUTORS AT TIMES ARE BIGGER LIERS THAN THE DEFENDANT THEY GO AFTER, NOT ALL PROSECUTORS ARE LIERS AND NOT ALL DEFENDANTS.

IN THIS CASE I AM A NON RECIDIVIST FOR OVER 4 DECADES AND IM NOT GONG TO LET ANYONE FRAME ME! IT AT LEAST 33% OF THE DEFENDANTS ARE FOUND INOCENT AFTER ONE YEAR IN SEC CASES SO WE WANT TO GIVE SOME UP FRONT OMBUDSEN DUE PROCES BEFORE A GUILT INITIATION SO

THAT THE COMMISSIONERS WILL HAVE MEANINGFUL JUDICIAL REVIEW (PRECOMPLAINT) 30 DAYS AFTER WELL SUBMISSION SO THEY WON'T PUNT TO THE DIVISION AS NOW 8 HOURS OF THEIR UNDIVIDED ATTENTION IS NOT ENOUGH FOR THEM TO LET POTENTIAL DEFENDANTS GO TO A NO ACTION LETTER PRE INITIATION OR SETTLEMENT; BUT THE NON BINDING IN CAMERA OPINION OF A FEDERAL JUDGE RETIRED SELECTED SINCE EACH DIVISION OF THE COUNTRY AND WITH THE SEC DIVISION OFFICE USED FOR EACH BY PROCEEDING OF THE LAWYER ONLY AND THE PROSECUTOR CASE INVESTIGATORS WILL GIVE THEM 3500 HOURS OF DUE DILIGENCE BY CBI 5 PERSON TEAM WHICH THE JUDGE IS THE LEADER. 33% DEFENDANTS WERE FOUND INNOCENT SO IF WE GIVE THE COMMISSIONERS AN INDEPENDENT IN CAMERA OPINION, NON BINDING AND THEN THEY MAKE THE DECISION THE DIVISION WON'T BE ABLE TO STEAL HOME PLATE TO PUNT!

IT'S NOT THE COMMISSIONERS' FAULT THAT THEY PUNT AS THEY DON'T HAVE THE H/R RESOURCES. MY TRUMP PLAN GIVES THEM THE TIME FREE. IT'S NOT THEIR FAULT THAT THE PRESUMPTION OF GUILT IS ATTACHED BY DODD-FRANK. THE HONORABLE SENATOR FROM MASS IS THE PROPOSANT OF THE DODD-FRANK AMENDMENT, BUT ELIZABETH WARREN NEEDS SOME TIME TO LEARN THAT CONNING COMMISSIONERS TO PUNT IS UNFAIR TO DEFENDANTS AS THIS LABEL IS TERRIBLE TO WASH OFF WHEN THEY ARE FINALLY FOUND INNOCENT AFTER \$2,000,000.00 IN COSTS TO OUR GOVERNMENT.

THE FACT THAT ALL 7 OF MY MATERIAL, INDISPENSIBLE NAMED BY ME WHICH INCLUDED MR BERYL WOLK A WMMA SHAREHOLDER OF WARRENTS' AND THE IMC OWNER WHO INFORMED ME HE WAS OFFERING \$90 MILLION FOR THE DATABASE AND REFUSED BEFORE THE SEC GOT THEIR BRADY AND THEN HE DIED THAT SOMEONE WHO WOULD SUPPORT THE \$83 MILLION APPRAISE HIS BRADY AND DIDN'T BRING HIM BACK BUT A GLIMMER OF IT IS IN HIS BRADY AS A RESPONSE WHEN I ASKED HIM DURING THE NEGOTIATIONS TO GIVE WMMA AN OPTION TO PURCHASE AND WHICH AT THE TIME WOULD NOT BE ABLE TO CONSUMMATE A SALE AS HE KNEW HE WAS DYING; BUT DID NOT TELL ANYONE. HE SAID HE'D SELL FOR ALL CASH AND NOT TIE UP HIS COMPANY'S ABILITY TO SELL TO THE HIGHEST BIDDER AND THEN GOD HE TOOK HIM. DIED, SO DID DAVID FRISHMAN A WMMA SHAREHOLDER AND KEY REGIONAL WDI EXECUTIVE AS DID MR FRANK PRICE A WMMA SR VP HUMAN RESOURCES AS DID GIORGIO KAUFMAN AN WMMA SHAREHOLDER AND FINDER WHO OBSERVED ON SEVERAL OCCASIONS MY DISCLOSURES TO PROSPECTIVE EMPLOYEE, AND CASH BUYER WHO WERE INFORMED BY ME UPFRONT OF MY BACKGROUND FELONY AND NON RECIDIVISM FOR 4 DECADES AND DESPITE THE FACT THAT OUT OF 300+ ACQUISITIONS INVOLVING ABOUT 1,000 SELLERS AND ABOUT THE SAME OPERATING PARTNERS OF THE NEWCO(S) THAT WE FORMED FOR THE ACQUISITIONS' AND ROLLUPS' MY WITNESS EITHER DIED, HAD STROKES, AND OR REPORTED TO ME THEY COULD NOT REMEMBER WITH SPECIFICITY THE EVENTS' 9 YEARS AGO.

IT DEMONSTRATES DISMISSAL SHOULD HAVE BEEN GRANTED AS I COULD NOT EVEN PAY A LAW FIRM AS A RESULT OF THE FRAUDULENT INDUCEMENT THAT JUDGE MURRAY AND THE PRESIDENT OBAMA COMMISSIONERS, LED BY THE HON. MARY JOE WHITE, WITH JUDGE MURRAY'S SUPPORT! THEY BOTH HAD SINCE 2008 THE ARTICLE 2 APPOINTMENTS READY FOR SIGNATURE SO THE FRAUD, CONSPIRACY AND ENTERPRISE ACTIONS WAS WILLFUL MALICIOUS AND WAS PERPETRATED AGAINST 150 IN HOUSE CONSPIRACY DEFRAUDED AND STOLE THE LITIGATION ASSETS SO THAT I'M DEPRIVED OF A LAW FIRM BECAUSE JUDGE MURRAY PERMITTED THE ASSIGNMENT OF FAKE ADJLS, HAD SHE NOT LED THE ENTERPRISE AND NOT APPOINTED FAKE JUDGES I HAVE THE MILLION

LITIGATION FUND AND MONEY TO PAY FOR THE TRIANSCRIPT, THEY DEFRAUDED ME OF THE ASSETS I NEEDED TO PROTECT ME SO THAT THE END RESULT IS THAT THEY ARE RESPONSIBLE FOR DEPRIVING ME OF MY CONSTITUTIONAL RIGHT AND THEFT OF MY ASSETS, THE 10,000 HOURS BY FRAUD AND DECEPTION WITHOUT DUE PROCESS IS PUNISHABLE INDIVIDUALLY WITHOUT LITIGATION IMMUNITY AND I DESERVE IT!

THE MURRY ENTERPRISE AND HER ASSOCIATED FRAUDULENT VIOLATORS THAT COULD NOT JUDGE ME AND KNEW THAT THE CONSTITUTION GAVE THEM A 2ND CHANCE TO RUN ME OUT OF THE MONEY AND TIME AND MAYBE DIE. I WON'T DIE JUST ON SPITE! JUDGE MURRAY AND JUDGE GRIMES BANNED TOGETHER TO BRING AN INNOCENT TO JUSTICE! WHAT A DEGENERATE DISGRACE, I APOLOGIZE; BUT SETTING ME UP, SWITCHING JUDGES AFTER I GET FAVORABLE DECISION, THEN LETTING THE GRIM REAPER DISOLVE THE PROTECTION KNOWING THAT MY LIFE WOULD BE AT STAKE BECAUSE HE DIDN'T LIKE THE OIP ALLEGATIONS!! THAT THE DIVISION USED TO DEFRAUD ALL OF THE AFORMENTED AND THE REFUSING ARE RECUSAL AND A DISMISSAL FOR THE 9 YEARS BEING TOO LONG FOR ME TO EVEN REMEMBER HALF THE SHIT FROM RELIEVING THIS CASE TO DEFRAUD ME BY THEM MCGRATH ENTERPRISE WITH THE MURRAY WENTERPRISE INTANDAM WITH :

Ms Puccio and the McFarlane enterprise trying to steal the company they raped from the inside and blaming me as the/rabbi the use of my 4 decade old mistake that didn't con any of the 50 judges I've been before winning every case as they all used that to steal judge Gmbreddela and her Mr Giordano trustee they knew the truth Judge Alpert in Chamco knew the truth and his trustees' lawyer a brilliant man whose name escapes me but after 3 years found me innocent what gnetlemen! HIM

JUDGE MURRAY AND THE PRIOR COMMISSIONERS BECAUSE I WAS FELON 43 YEARS BEFORE AND AFTER I PAID FOR IT, IT MUST BE STOPPED!! A FORMER PRESIDENT WHEN HE WAS LEAVING OFFICE AND HIS WIFE ASKED ME FOR \$100,000.00 FOR THE LIBRARY AND I PAID HALF THEN REALIZED WHAT GOOD IS A PARDON YOU HAVE TO PAY FOR AND RECEIVED THE DOWNPAYMENT BACK NOT PRESIDENT TRUMP HE DOESN'T NEED MONEY AND CAN'T BE BRIBED AND HE HAS RIGHT TO SEE IF JOE BIDEN SKIDDISPASSES SOME OF THE UKRANES MONEY THRU HIM TO JOE BEFORE HE PAID \$ THE UKRANE THAT'S HIS JOB HE JUST GOT THE ISIS LEADER THAT'S HIS JOB TO PROTECT US. JUDGE MURRAY YOU LET A NON JUDGE DISOLVE THE PROTECTIVE ORDER KNOWING I COULD DIE AND YOU WANT TO JUDGE ME! ARE YOU KIDDING?? DISOLVE A PROTECTIVE ORDER WHEN IRREPERBLE HARM WAS FOUND BY YOUR OWN JUDGE?? IT'S NOT THAT I'M CALLING YOUR HONOR A CROOK AS I WNT TO BE NICE, IF I DID NOT END UP LIKING YOU I'D SUE YOU BUT I WANT THIS SETTLED

I WAS AN OFFICER AND TANK COMMANDER TO PROTECT OUR COUNTRY TO DEFEND AND AT MY AGE OF 81 AND A SOLE PROVIDER OF MY WIFE [REDACTED] AND I'M A HUNT AND PECK TYPIST I ONLY LEARNED IN 2014 AT A HIGH SCHOOL COURSE. WITH MY OWN ILLNESS IT'S IMPOSSIBLE TO RECEIVE THE CONSTITUTIONAL BENEFIT THAT WERE STOLEN FROM ME BY JUDGE MURRAY, MCGRATH, JUDGE GRIMES ET AL ALL OF THE DEFENDANTS THAT THE SUPREME COURT IN ITS WISDOM AND COURAGE INFORMED THE SEC TO PROVIDE A NEW JUDGE THAT HAD NO EXPERIENCE WITH THE PRE LUCIA VS SEC (AUGUST 2018)

Judge murray must have her own [REDACTED] i asked her to recuse herself with the conflicts she has with as she switched judges when judge Feolak found I'd be irreperably harmed I testified and gave a 7 factor test federal judges use to asses wether and adjournment is fair,, I failed all 7 factors ans when I was being deposed by the sec, at the beginning of the 2d half [REDACTED]

after Judge Feolak found after highly contested with issues an
no question I could [redacted] Judge murray interfered in my case and threw Judge feolak
off my case threw in her ringer Judge James Grimes also is constructional violator as Judge murray and
she thinks she is coming the world or doesn't care whose right she she chose to trod over and I realized
that Judge lillian McEwen and Judge Elliot must be right and I'm in the center of Judge fixer and
violater[s] of the constitution,,,

Judge murray while defrauded me before the Lucia decision, she commits theft of my 10,000 hours by
appointing all violetears adjls; which she knowingly knows that the constitution penalty is a retrial which
means double costs after they milked /stole my million defense budget and then after she re fuses to
recuse her self, refuses to respond to my vacate motion and reply with call for support, the violations
and theft personally as I'm not suing my country! Its the individuals that participated in the civil rico
which over 150 predacatacs of theft of my assets and the other defendants through fraud and
deception whithout due process I

include a draft declaration and motions under this motion and decoration This comes first then the
declaration sent out under this cover and then the exhibits of the odd initial decision pages the certified
rmail receipt found when I opened the certified letter that my wife misplaced for 3 days half done with
no even pages when I found it and the envelop to weigh the proof only half was sent. Once I'm getting
my full intil decision and if there is no dismissal and or settlement then we move forward till the case is
brought up in federal wherever this clean commission takes me.

Respectfully,


[redacted]

e m daspin pro see 3:43 11/1 10

THE HONORABLE DONALD J TRUMP PRESIDENT OF THE UNITED STATES [CERTIFIED MAIL] FOR HIS
PERMISSION TO USE HIS NAME IN HIS HONOR TO SAVE COMMISSION LITIGATION COSTS, THE
REPUTATIONS OF SOME OF THE INNOCENT TO BE DEFENDANTS IF NOT FOR THIS PLAN WITH DUE PROCESS
AHEAD OF THE DODD FRANK AMMENDMENT LOCKING IN! AT NO COST TO US WITH A BOUNTY
FOR EVERY AMERICAN WE SAVE FROM THE FATE THAT I WENT THRU AND SAVING OUR COUNTRY
FOR ONE BETWEEN 41 MILLION AND \$5 MILLION AS THE OMBUDSMEN REPORT TO THE
COMMISSIONER OF EACH STATE PRIOR TO THE INITIATION OF A LAW SUIT TO GIVE 3,500 HOURS OF
DUE DILIGENCE FREE AND SAVE IF THE BETQ TEST WORKS' 200 DEFENDANT PER YEAR AND AN
ABOUT \$200,000,000.00 A YEAR FOR THE COMMISSIONS REDUCTION OF 5% OF ITS COST +/- ACTUAL
NUMBERS CERTIFIED TH WHITEHOUSE AND BEDMINSTER AT HIS COUNTRY CLUB. WITH AN INVITATION
FOR ME TO MEET WITH HIM WHEN HE GETS INTO TOWN OR FOR HIM TO VISIT ME AT MY HOME IN
[redacted] TO GO OVER THE PLAN IF INTERESTED!

THE COMMISSION THRU MR FIELDS CERTIFIED MAIL AND EMAIL;

, MS, SHIELDS FOR JUDGE MURRY AND ALL 5 ADJLS [E MAIL AS WELL AS CERTIFIED

MR MCGRATH, MR SHAPANKA AND MR AGOSTINI. E MAIL ONLY

CERTIFICATE OF SERVICE ON 11/1/19



WARRENTHLDERANDIF, WITHNOQUATRENTEESINTENEDND ORIMPLIED THE COMPANYMAEHALF OD THEPROFECTIONSIN 6YEARS THE WARRET COUL TOTAL#3MILLIONTO 45MILLIO SONOONE,NOONEHAD TO TKEANYRISCK TO BE APAERTNERANDASHOTATMILLNSF HEORSEHE JUSTCAMEIN TO WORKAND THENOM 3 TO SYEARSASKED FOR THENET,,NO ONE NEEDED TO INVESTA PENNY AS WMMA RECEIVED THEIR LABOR AT NO UP FRONT WEEKLY AND OR MONTHLY SIGNIFICNT COMPENSATION IT WAS DEFERRED ENOUGH TO TAKE OUT TO THE SUNDAY IN 2015 OR 16!

This is so important as my wife had loaned over \$350,000.with the \$87,000.00 start up 2010: the start up cash of \$87,000.00 in the ppm and the main equity of \$333,333,33 meant that wmma was fed for a year without any other investments; so no pressure was on anyone to invest and in fact WMMA was very conservative as no expenses amounted to more than \$25,000.00 a month out of basement office and we could put 20 employees comfortable and use the parlor and or upstairs for interveiws .Since Mr Nwugugu was a joint venture partner for about 7 years when this deal came up he had vetted me for 7 years an vey rimeltwased and we were sued Thw llwationsaout securities was dismissed and in chamco after years and we funded the Cmpany with a 506 PPM the securits clims we were found innocent and Nwuguguised that service contract ashis replinhseantation to the secof his original Brady contelnd his answers to eh OIPLLWGATION LINE BY LINE AND HE EXCULPATME AS HE WAS VERY HIGHTLY EFICATED AND WITH SERIES 7/13.2 YEARS LAWSCHOOL Acpa AND AN ADJUNCT PROFFESOR AT A CITY UNIVERSITY IN FNCE Gaduareschool wel published articles top draw,, Wvery deal he vetted the company had it law for and cpa for mand In insurance broker like willis and Marshan they have high brown house sexrities lawyers before they underwrite it for an insurance company.. Every law and accounting tform aselin wmma accepted his work product brought it to thei or firms ie plapiper and mcGladerty and the partner in char of wmas account aeme a thin sup as negotiated a line of credits a starrup need capital potectso we use vendor creitlik myandr may MKMA gace unlimie xredit towma as we all looked to the back end big pay day! And MKMA and CBI gave it \$3,000,000.00 in credit and only receives 240,000.00 for 30 months fees and \$600,000.00 did not charge fir 2010! In other words by the time Doung main came in land CBI had nested weat equity of \$,599,999,999 nas my wifes lans was \$359,999.99! If needed nd it was needed t fett great realestate penthouse office as the company needed a network of amillionans [d with #1,000,000 fee forgiveness on lmc and the Minequity and the wmmah loans thajoa n fnded as loans at the llding company wich invested in WMMA/usa shares acea real \$1,400,000.00 for wma and \$30,000.99 ash in he bank They signed the lease for a 3 years sub lease and then an extension as WMMA hire some of the wrong people and a very speedy employment ratel sa startu os nightmare But wma invited jonskers at least 3 day if not 4 a week with -3 visitors a day fro 5 figure jonsisungit for 10 years for jons seekers and about 0% want to invest so the ps wereredy so that an overveia after and a wassigned was customary and myounf-g took care of the enda the visitor files ith Mr Brnjam sr vp human rescourses whlowed his own nortgage brokerage firm and knew credit for ome equity lines for home buers He made about #15m 6=760 or half of the 25% off first year compendation i the qarrent gilder for sweqar] t equity to defer the compensation until wmma made a \$1.00 a ter paung that months compensation to the employees if anything left over MKMA reve 10% of the incementl, pretax and orequity with acapand nom requitemen to etpaid if mma wa strapped ashis wa a great inditry with a gretvison o cut the event con tencosts uinsing the internet to corout the cable and tv huf=gepelce of the payper velwie 22 to 40% I with the intent its 10% I thast asaving so 80% OF CABLE COSTS AND ALL WMA NEEDED WAS TO FINISH THE WES] DSISEA DHIEA CTO TO CONECT WMMAS SIE WITH IMC DATABASED AND M WILL MOULD SEND OUT THE MAILS BY THE MILLIONS FOR A FREE WMA PLATIM NUM CARD AND 105 DISCOUNT RESERVED

EX. F

From: [Rodriguez, Elvia](#)
To: [McGrath, Kevin](#)
Cc: [Woodworth, Charles](#); [Shields, Kathy Moore](#); [O'Connell, Barry](#)
Subject: RE: In the Matter of Edward Daspin, A.P. File No. 3-16509
Date: Friday, November 08, 2019 1:23:53 PM

The additional copies were sent out on Nov. 6th; it should take a few days to receive the certified receipt. I can let you all know when it comes in.

Thanks

Elvía Rodríguez

From: McGrath, Kevin <McGrathK@SEC.GOV>
Sent: Friday, November 8, 2019 10:10 AM
To: Rodriguez, Elvia <rodriguez@SEC.GOV>
Cc: Woodworth, Charles <woodworthc@SEC.GOV>; Shields, Kathy Moore <ShieldsK@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>
Subject: RE: In the Matter of Edward Daspin, A.P. File No. 3-16509

Thank you. Elvia. Can you tell us when it was sent and whether you received a return receipt confirming delivery?

Kevin

From: Rodriguez, Elvia <rodriguez@SEC.GOV>
Sent: Friday, November 8, 2019 10:02 AM
To: McGrath, Kevin <McGrathK@SEC.GOV>
Cc: Woodworth, Charles <woodworthc@SEC.GOV>; Shields, Kathy Moore <ShieldsK@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>
Subject: RE: In the Matter of Edward Daspin, A.P. File No. 3-16509

Hi Kevin,

It was, the certified mail number is: 7014-3490-0000-8086-9186

Let me know if you have any other questions.

Thanks

Elvía Rodríguez

From: McGrath, Kevin <McGrathK@SEC.GOV>
Sent: Thursday, November 7, 2019 6:48 PM
To: Rodriguez, Elvia <rodriguez@SEC.GOV>
Cc: Woodworth, Charles <woodworthc@SEC.GOV>; Shields, Kathy Moore <ShieldsK@SEC.GOV>;

O'Connell, Barry <OConnellB@SEC.GOV>

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

Elvia: I am one of the trial counsel in the above AP. As you may know, Mr. Daspin was originally sent an incomplete copy of the Initial Decision (only the odd numbered pages). Was a complete copy of Judge Murray's Initial Decision subsequently sent to Mr. Daspin by certified mail? If so, can you provide us with the certified mail receipt? ;

Thank you.

Kevin McGrath

From: Baldwin, Margaret <baldwinm@SEC.GOV>

Sent: Tuesday, November 5, 2019 11:21 AM

To: McGrath, Kevin <McGrathK@SEC.GOV>

Cc: Shields, Kathy Moore <ShieldsK@SEC.GOV>; Woodworth, Charles <woodworthc@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>

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

Hello Kevin,

I've passed this along to Elvia Rodriguez who is assigned to this case.

Maggie

From: McGrath, Kevin <McGrathK@SEC.GOV>

Sent: Tuesday, November 5, 2019 11:15 AM

To: Baldwin, Margaret <baldwinm@SEC.GOV>

Cc: Shields, Kathy Moore <ShieldsK@SEC.GOV>; Woodworth, Charles <woodworthc@SEC.GOV>; O'Connell, Barry <OConnellB@SEC.GOV>

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

Ms. Baldwin: I am one of the NYRO Attorneys on this matter. Chief ALJ Murray issued an Initial Decision in this case on October 16, 2019. The respondent Edward Daspin has informed us that the copy of the Initial Decision served on him only had the odd numbered pages. The copy we received from your Office also only had the odd numbered pages.

Has a complete copy of the Initial Decision been formally served on Mr. Daspin? If not, can you do so and serve us with a copy as well?

My number is [REDACTED] if you have any questions.

Thank you.

Kevin

EX. G

11

From: McGrath, Kevin
To: O'Connell, Barry
Subject: FW: stireupspleasesubmitsignedam tommorowadda crtificatofserviceandsignmyname asmyPOA toMrFields[3copis for commissioners,oneforMxShields hardcopy for judge Murray and email to mcgrathands Please remove redundantparagraphsits aglitchinthiscomputerandddthe
Date: Wednesday, December 04, 2019 3:40:44 PM

From: DASPIN [REDACTED]@optonline.net>
Sent: Wednesday, December 4, 2019 1:07 AM
To: [REDACTED]@optonline.net; schieldsk@sec.gov; [REDACTED]@optonline.net; McGrath, Kevin <McGrathK@SEC.GOV>
Subject: stireupspleasesubmitsignedam tommorowadda crtificatofserviceandsignmyname asmyPOA toMrFields[3copis for commissioners,oneforMxShields hardcopy for judge Murray and email to mcgrathands Please remove redundantparagraphsits aglitchinthiscomputerandddthe ...

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms.Shields and Mr. Fields,

I wish to advice and declare that i was incapacitated and given a medical procedure on wed November 13,and put under [REDACTED] i was released and put under a 2-3 day bed rest with instructions not to move round and let the procedure work to maximize the benefits and no driving for at least 5.I slept for 30 hours straight and then on Monday , November 18, i received a letter certified from the US Postal service. I did not sign for it ;but accepted its delivery on November 18;.Than, although it may have been delivered earlier , THE SECDIVISION WAS DERILICT AS THE LEAST THEY COULD HAVE DONE WAS RETURNED FILES THAT I SUBITTED TO THE COURT

As Edward MDaspin Pro SEE 12/2/19

[REDACTED]
[REDACTED]@OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
DECLARATION AND BREIF IN SUPPORT OF
MOTION FOR TRANSCRIPT&EXHIBIT[S] FROM HEARING AT
NO CHARGE UNDER THE EQUAL PROTECTION UNDER THE LAW
CONSITUTIONALAMMENDMENT ON AN EMERGENT BASIS BY
AND OREDER TO SHOW CAUSE AS IRREPERABLE DAMAGEOCCUR WILLTO ME IF IM NOT
GRANTED
THE RELEIF REQUESTED!
Dear Mr.Fields & Ms.Shields,

I declare under the laws of the united states that the forgoing is true to the best of my knowledge. I know I
If I willfully misrepresent, I am subject to punishment:

As a result of my [REDACTED] i recently underwent a medical procedure which [REDACTED]
[REDACTED] by an [REDACTED]. My doctor recommended [REDACTED] after the procedure and
by the time I came home I slept for 24hours straight.so that the fluid consisting in part of [REDACTED]
[REDACTED] and
am currently taking [REDACTED] that still remains but to a much lower effect than before
the procedure.

However with my advancing age ,as im almost [REDACTED], and the [REDACTED] every day or [REDACTED]
[REDACTED] ! have
slowed down remarkably since this last procedure and my [REDACTED] with each passing month
and year by old age, the [REDACTED] and my being my wifes' primary care giver as well as
taking care of all the work she used to do for us.

I underwent the medical procedure on November 13,2019.I was placed under bed rest for 3 days and I
picked up the mail on the next Monday morning on November 18 ! i saw the SEC insignia on the brown
manila envelope and knew it was only the replacement initial decision printed on both sides of each page

as it wasn't thick enough to include the transcript and exhibits I motioned for.

Since ive waited sufficient time for the documents i need to be able to properly and fully defend myself and to point out Judge Murrays' multiple manifest errors of fact in her initial decision. If the transcript will be able to prove some of the points that my memory of the hearings witness' admissions will prove some of her errors of fact but I wont be able to exactly recite the page number ,para number and only refer to the document numbers which is ,it dawned on me

To the Commissioners, it might be considered a waiver of my rights not to appeal to the commission for the documents which im supposed to obtain free for indigent persons' such as myself; I did send the commission a copy of my motion[s]for the transcript and haven't

I also did not received any answers to my prior motions' nor received any answer in the required 20 days from the court and or the division from Judge Murray nor 'has this Commission entered on its own discretion the disagreement wherein I have been irreparably [REDACTED] and will continue to be [REDACTED] unless this commission signs a turnover order for the division and or the court to give me copies of the trascripts' of the hearings whithout costs t

As Edward MDaspin Pro SEE 12/2/19

[REDACTED]
[REDACTED]@OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
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However with my advancing age ,as im almos [REDACTED] and the [REDACTED] or [REDACTED] ! have slowed down remarkably since this last procedure and my [REDACTED] with each passing month [REDACTED] by old age, the [REDACTED] and my being my wifes' primary care giver as well as taking care of all the work she used to do for us.

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I now motion that this commission accommodate my request for the transcripts and exhibits which are already printed and ill pay, if required by this commission the copying costs by the inhouse SEC Secretary the HON. Ms Shields; that the time is ripe to appeal the lower courts rejection of my motion for the transcripts free pursuant to the equal rights amendment to the constitution and that the courts abused its power and discretion by denying me those documents and put me in a severe disadvantage and without them prior to the conclusion of the lower courts de termination I will be irreperably [REDACTED] as this courts manifest errors of fact include delegations of power when the investor properstors as SEC witness and brady witness denied that I violated any laws and/or moral standards and that one of the 6 investors admitted always tried to do the right thing while at WMMA and the trustee of the WMMA chapter 11 found I committed no wrong doing while I was at WMMA to WMMA and did 2 additional WMMA investor operators .

In fact the SECs own fraud analyst testified as she found no fraud by me and that that Wells not was proven to have eliminated all the exculpatory information and all the material omissions of fact which the division had in hand prior to filing the Wells notice. In this regard the division committed Prosecutorial misconduct unparcelled in the history of the SEC on the commissions that the division has a fiduciary to dealing in good faith and to provide the commissioners with all the information thats' in it possession at the time it submitted the wells notice. Instead the division withheld Mr, Lux wmmas 'ceos' 8/27/13 deposition and neither an officer directors or shareholder that he was in ie; the Board meetings I didn't vote nor voice over any of the directors that the evidence demonstrates in

As Edward M Daspin Pro SEE 12/2/19

[REDACTED]
[REDACTED] @OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
DECLARATION AND BREIF IN SUPPORT OF
MOTION FOR TRANSCRIPT & EXHIBIT[S] FROM HEARING AT
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As a result of my [REDACTED] I recently underwent a medical procedure which involved [REDACTED] by an [REDACTED]. My doctor recommended [REDACTED] after the procedure and by the time I came home I slept for 24 hours straight so that the fluid consisting in part of [REDACTED] and am currently [REDACTED] than before the procedure.

However with my advancing age, as I am almost [REDACTED], and the [REDACTED] or [REDACTED] [REDACTED] !! have slowed down remarkably since this last procedure and my [REDACTED] with each passing month and year by old age, the [REDACTED] and my being my wifes' primary care giver as well as taking care of all the work she used to do for us.

I underwent the medical procedure on November 13, 2019. I was placed under bed rest for 3 days and I picked up the mail on the next Monday morning on November 18 ! I saw the SEC insignia on the brown manila envelope and knew it was only the replacement initial decision printed on both sides of each page as it wasn't thick enough to include the transcript and exhibits I motioned for.

Since I've waited sufficient time for the documents I need to be able to properly and fully defend myself and to point out Judge Murrays' multiple manifest errors of fact in her initial decision. If the transcript will be able to prove some of the points that my memory of the hearings witness' admissions will prove some of her errors of fact but I won't be able to exactly recite the page number, para number and only refer to the document numbers which is it dawned on me that it might be considered a waiver of my rights not to appear to this commission for the documents which I'm supposed to obtain free for indigent persons such

as myself; I did send this commission copy of my motion for the transcript and in haven t received any answer from Judge Murray nor has this Commission entered on its own.

I now motion that this commission accommodate my request for the transcript and exhibits which are already printed and ill pay the copying costs by the inhouse SEC Secretary the HON.Ms Shields, that the time ripe to appeal the lower courts rejection of my motion for the transcripts free pursuant to the equal rights' amendment to the constitution, I had given the court my declaration of my cash flow and net worth as certified by me .So im being left with no alterative but topetiton this .proving that's some one mistakenly did not push the 2nd side button as I only received one side, the odd numbers,Now I have all pages;but not that transcript that goes with it!!!funny first

As Edward MDaspin Pro SEE 12/2/19

██████████
██████████@OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
DECLARATION AND BREIF IN SUPPORT OF
MOTION FOR TRANSCRIPT&EXHIBIT[S] FROM HEARING AT
NO CHARGE UNDER THE EQUAL PROTECTION UNDER THE LAW
CONSITUTIONALAMMENDEMENT ON AN EMERGENT BASIS BY
AND OREDER TO SHOW CAUSE AS IRREPERABLE DAMAGEOCCUR WILLTO ME IF IM NOT
GRANTED
THE RELEIF REQUESTED!
Dear Mr.Fields & Ms.Shields,

I declare under the laws of the united states that the forgoing is true to the best of my knowledge. I know I
If I willfully misrepresent, I am subject to punishment:

As a result of my ██████████ i recently underwent a medical procedure which involved ██████████
██████████ by an ██████████ My doctor recommended ██████████ after the
procedureandby the timeicamehomeislept for 24hoursstraight.so that the fluid consisting in part of
██████████ and am currently ██████████
than before the procedure.

However with my advancing age ,as im almost ██████████ and the ██████████
██████████ !! have
slowed down remarkably since this last procedure and my ██████████ with each passing month
and year by old age, the ██████████ and my being my wifes' primary care giver as well as
taking care of all the work she used to do for us.

I underwent the medical procedure on November 13,2019.I was placed under bed rest for 3 days and I
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amendment to the constitution .

,I had given the court my declaration of my cash flow and net worth as I declared

Edward M Daspin Pro SEE 12/2/19

[REDACTED]
[REDACTED]@OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
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[REDACTED] and am
currently [REDACTED] than before the
procedure.

However with my advancing age ,as im almos [REDACTED] and the [REDACTED] or [REDACTED]
[REDACTED]!! have
slowed down remarkably since this last procedure and my [REDACTED] with each passing month
and year by old age, the [REDACTED] and my being my wifes' primary care giver as well as
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rights not to appeal to this commission for the documents which im supposed to obtain free for indigent
persons' such as myself . I did send this commission a copy of my motion for the transcript and I haven't
received any answer from Judge Murray nor has this Commission entered on its own..

I now motion that this commission accommodate my request for the transcript and exhibit which are
already printed. .

So im being left with no alterative but to petition this .commission proving that some one mistakenly did not
print the 2 sides of each page as was intended as I only received one side the odd numbers,

The problem with this case is that Judge Murryis so full of conflicts of interests that its becoming a joke
even for her honor,,She participated in fraudulunt inducement of myself and150 other pre lucia
defendants whose what judge Murray and the prior commissioners have been concealing since 2008
and they judge mention our alleged concealment the facts to the detriment !They can
reentketheirownmedicine.IvebeenabysedByJudgeMurray,KevinMcGrath,BarryOconell and Nicholas
kolodny and possibly on

As Edward M Daspin Pro SEE 12/2/19

[REDACTED]
[REDACTED]@OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
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MOTION FOR TRANSCRIPT&EXHIBIT[S] FROM HEARING AT
NO CHARGE UNDER THE EQUAL PROTECTION UNDER THE LAW
CONSITUTIONALAMMENDMENT ON AN EMERGENT BASIS BY

AND ORDER TO SHOW CAUSE AS IRREPERABLE DAMAGE OCCUR WILL TO ME IF IM NOT GRANTED THE RELIEF REQUESTED!

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As a result of my [redacted] i recently underwent a medical procedure which involved my [redacted] [redacted] by an [redacted] My doctor recommended [redacted] after the procedure and by the time i came home i slept for 24 hours straight so that the fluid consisting in part of [redacted] and am currently taking [redacted] than before the procedure.

However with my advancing age ,as im almost [redacted] and the [redacted] [redacted] and the [redacted] !! have slowed down remarkably since this last procedure and my [redacted] with each passing month and year by old age, the [redacted] and my being my wifes' primary care giver as well as taking care of all the work she used to do for us.

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I now

As Edward M Daspin Pro SEE 12/2/19

[redacted] @OPTOMLINE.NET case 3-16509 AT & CASE 3-16509
DECLARATION AND BREIF IN SUPPORT OF
MOTION FOR TRANSCRIPT & EXHIBIT[S] FROM HEARING AT
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As a result of my [redacted] i recently underwent a medical procedure which involved my [redacted] [redacted] by an [redacted] My doctor recommended [redacted] after the procedure and by the time i came home i slept for 24 hours straight so that the fluid consisting in part of [redacted] in the [redacted] than before the procedure.

However with my advancing age ,as im almost [redacted] and the [redacted] or [redacted] ! have

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I now motion that this commission accommodate and grant my request for the transcript and exhibit which are already printed and ill pay the copying costs by the in house administration MsShields that the time is ripe to appeal the lower courts rejection of my motion for the transcripts free pursuant to the equal rights ammendment to the constitution,I had given the court my declaration of my cash flow and net worth I certified to .Im being left with no alterative, but to petition this commission.e button as I only

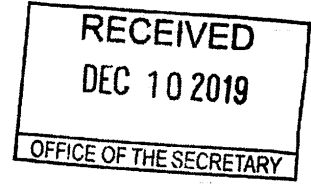
My motion that this commission accommodate my request for the transcript and exhibits and 20 days to reply and which are already printed !Judge Murray had a conflict of interest since she started abusing her assignment judges roles and orchestrated who would be guilty and who should plead out not by holding control; over the adjs. In fact its very similar to that her accusing me of having intellectual sway and that's called natural born leadership not control to commit violations of the law.Mr Sullivan stated" Mr Daspin believed he was doing the right thing "I did and the only time they turned and lied alleging i controlled all things was when informed them they lost the company and their own investment and i couldn't in good faith recommend this team was when informed them as soon as all shareholders receive their shares I am going to stop coming in and look at other business aa they felt obligated to use me as the vehicle to escape the wrath of their wives at blowing their investment and our company,

Respectfully

E M Daspin Pro SEE

EX. H

Reply Delete Junk Block ...



pleasesend this declaratio to Mr Fields for the commission sign my name and overnight it. Dear Mr Fields

Getting too much email? Unsubscribe

DASPIN Wed 12/4/2019 6:11 PM The UPS Store #4650

3-16509 ↩ ↪ → ...

Dear Mr Fields, With respect to 3-16509AT and 3-156509 [before Judge murray,]

MOTION FOR RECONSIDERATIONS BY THE COMMISSIONERS TO REINSTATE THE TIME I HAD TO ANSWER THE INITIAL DECISION. THE RECORD IS REplete AND I DECLINE UNDER THE LAWS OF THE UNITED STATES THAT THE FOLLOWING DECLARATION IS TRUE TO THE BEST OF MY KNOWLEDGE!

1) JUDGE MURRAY'S INITIAL DECISION WAS SENT TO ME ONLY THE OF DD NUMBERED PAGES WERE SENT I THEN MADE A REQUEST FOR THE ENTIRE INITIAL DECISION WHICH I RECEIVED IN NOV 18, 2019 according TO THE RULE I PERMITTED 20 DAYS AFTER RECEIPT BY ME OF THE DELIVERY OF CERTIFIED MAIL. I DID NOT SIGN FOR THE CERTIFIED MAIL DELIVERY UNTIL I RECEIVED IT ON NOV 18, 2019.

I OBJECT TO JUDGE MURRAY MAKING IT A FINAL ORDER AND DECISION AS I MOWED 5 ADDITIONAL DAYS AS MY EMAIL SUBMISSIONS AND DECLARATION PROVE.

JUDGE MURRAY JUMPED THE GUN AND DOES NOT WANT TO DEAL WITH THIS CASE AND BY SO DOING SHE IS DENYING MY RIGHTS IALS FOR AN EXTENSION OF TEN DAYS FROM RECEIPT OF THE EMAIL MOTION TO SUBMIT DECLARATION IN SUPPORT OF A DISMISSAL OF THE ORDER SIGNED ON TODAY'S DATE. MOTION THAT THIS COMMISSION ORDER JUDGE MURRAY TO GIVE ME THE ADDITIONAL 5 DAYS I MOWED TO RESPOND TO THE MANIFEST ERRORS CONTAINED IN THE INITIAL DECISION AND I MOTION THAT THE FINAL ORDER BE REVERSED UNTIL I RECEIVE THE 20 DAYS UNDER THE RULES. JUDGE MURRAY SHORTED ME BY 5 DAYS. I WILL SUBMIT MY OPPOSITION TO THE INITIAL ORDER OR IF THIS COMMISSION DOES NOT GRANT MY MOTION FOR JUDGE MURRAY'S FINAL DECISION TO BE REVERSED FOR 5 DAYS FROM THE COMMISSION'S APPROVAL THE SUBMISSION I WILL MAKE TO THE COMMISSION UNDER RULE 11 OR WHATEVER RULE PERMITS ME TO BE FOUND INNOCENT AND OR TO DISMISS THE CASE FOR THE REASONS STATED IN MY SUBMISSION I WILL SEND MY OPPOSITION TO THIS COMMISSION REQUESTING A DISMISSAL ON THE GROUND THAT I HAVE REPORTED IN MY PRIOR SUBMISSIONS COPIED TO THE COMMISSION WHICH I MADE TO JUDGE MURRAY IN THE ABOVE CAPTIONED CASE.

THE FACT THAT THE COURT DOES NOT WANT TO GIVE ME THE 20 DAYS FROM MY RECEIPT OF THE CERTIFIED MAIL IS INDICATIVE OF THE ABUSE OF DISCRETION...

EX. I

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 6714/December 4, 2019

ADMINISTRATIVE PROCEEDING
File No. 3-16509

In the Matter of

EDWARD M. DASPIN, :
a/k/a "EDWARD (ED) MICHAEL," : NOTICE
LUIGI AGOSTINI, and :
LAWRENCE R. LUX :

The Securities and Exchange Commission instituted this proceeding with an Order Instituting Proceedings on April 23, 2015, pursuant to Section 8A of the Securities Act of 1933 and Sections 15(b) and 21C of the Securities Exchange Act of 1934. An Initial Decision as to Edward M. Daspin was issued on October 16, 2019.¹ *Edward M. Daspin*, Initial Decision Release No. 1387, 2019 SEC LEXIS 3985 (C.A.L.J.). Pursuant to 17 C.F.R. § 201.111(h), the presiding administrative law judge is authorized to "consider[] and rule[] upon . . . a motion to correct a manifest error of fact in the initial decision. . . . *Any motion to correct must be filed within ten days of the initial decision.*" (emphasis added).

Starting on November 4, 2019, the Office of Administrative Law Judges received a series of submissions from the parties. Because the time for motions to correct manifest errors of fact had expired by that date, an administrative law judge lacks authority to consider the filings. *Alchemy Ventures, Inc.*, Exchange Act Release No. 70708, 2013 WL 6173809, at *3 & n.25 (Oct. 17, 2013) ("[O]nce the initial decision is issued, our rules largely divest the law judge of authority over the proceedings."). Any future submissions should be directed to the Commission.

/s/ Carol Fox Foelak
Carol Fox Foelak
Acting Chief Administrative Law Judge

¹ The proceeding had ended as to the remaining respondents. *Edward M. Daspin*, Securities Act Release Nos. 9963, 2015 SEC LEXIS 4287 (Oct. 16, 2015); 10243, 2016 SEC LEXIS 4086 (Nov. 1, 2016).

EX. J

From: DASPIN
To: Shields, Kathy Moore; McGrath, Kevin
Cc: O'Connell, Barry; Thomas, Charvelle; Woodworth, Charles
Subject: Re: FW: In the Matter of Edward M. Daspin, A.P. File No. 3-16509
Date: Wednesday, July 31, 2019 11:04:57 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

DEAR MS SHIELDS;

THANKS FOR THE COPY OF MCGRATHS LETTER OF JULY 27, 2019. MY DECLARATIONS AND MOTIONS WERE NOT IN RESPONSE TO HIS FILINGS !

I DONT EVEN READ THEM ANY MORE AS THEY ARE JUST FURTHER PROOF OF THE FALSITY OF HIS COMPLAINTS' ALLEGATIONS AND JABBERWOCK!.

i ASK THIS COURT NOT TO DENY ME THE RIGHT TO REBUT MR MC GRATHS NEXT REBUTAL TOMY DECLARATIONS AND I ASK THE COURT TO GIVE HIM HIS EXTENSION OF THE TIME REQUIRED TO ANSWER MY DECLRATIONS.HIS ONLY RESPONSE TO MY DECLARATIONS STATEMENTS OF FACT COULD BE THAT EVERYTHING I STATED WAS TRUE AS IT WAS AS THE TRANSCRIPT RECORD PROVES. FROM MY MEMORY .i ALSO ASK FOR TIME TO OBTAIN THE TRANSCRIPT AS I FINALLY WASABLE TO GET THE FUNDS FOR IT!,SO PLEASE SEND ME THE COMPANY AND TELEPHONE NUMBER AGAIN SO I CAN APAY WITH A CREDIT CARD AGAINST THE TRANSCRIPTS COST WHICH MY INDIGINANT STATE WOULD NOT PERMIT, I WILL NEED 4 WEEKS'EXTENSIONAS THE DELAY WA ATTRIBUTABLE TO MY [REDACTED] [REDACTED] AND I HAD TO GET IT FROM OTHER SOURCES THAN MY WIFE; TO USE THE TRANSCRIPTS', COMPARE THE EXHIBITS AND PROVIDE THE COURT WITH THE SCHEDULE OF EXHIBITS LAID OUT INTHE TRANSCRIPTS!!

i REQUEST AN EXTENSION OF ONE[1] MONTHS TIME TO PROVIDE THE COURT WITH THE EXHIBITS IN THE COURTS ORDERS CONTINED IN THE TRANSCRIPTS ONCE I GET THEM! I NEED MORE TIME AS ITS MY WIFES ILLNESS IS TIME CONSUMING AS IM SURE THE COURT UNDERSTANDS!

RESPECTFULLY'E.M. DASPIN PRO SEE[P.S. i DID NOT REVIEW MR MC GRATHS' SUBMISSIONS AS IT IS MY POSITIN HE PERPETRATED A FRAUD ON THE COMMISSION BY ELIMINATING THE EXCULPATORY EVIDENCE HE HAD AS THIS COURT HAS NOW SEEN WITH ITS OWN EYES HIS WELLS NOTICE OMMITTEDALLTHE EXCULPATORYEVIDENCE! ORESENTED AT TRIAL OR SOME ONE OF HIGHER AUTHORITY APPRISED HIM IT WOULD BE OK TO ELIMINATE THE EXCULPATORY EVIDENCE!!

I WILL SUBMIT TO THE COURT WITH THE EXHIBITS

.RESOECTFULLY E M DASPIN[IM SORRY I CANT KEEP UP WITH THE COURT

SCHEDULING AS IM ILL,MY WIFE ISILL,IM INDIGANT ,MY WIFE WONT LET ME TO USE HER ASSETS ON "THISBULLSHIT CASE";NOT FILE HER ASSETS IN FORM D A [AS THE PROSECUTIONIS RESPONSIBLE FOR HER BANK EVICTING HER BROKERAGE ACCOUNT] [[ALLOF WHICH IHOLDTHEM RESPONSIBLE FOR AS HER POWER OF ATTORNEY!]]SO THAT I COULDNT DO IT AND WAS IN BETWEEN A ROCK AND A HARD PLACE UNTIL I WAS,ABLE TO PUT TOGETHER THE FUNDS WHITHOUT USE OF HER FUNDS!.

E M DASPIN PRO SEE

On July 30, 2019 at 11:25 AM "Shields, Kathy Moore" <ShieldsK@SEC.GOV> wrote:

Courtesy.
Kathy Shields

From: McGrath, Kevin <McGrathK@SEC.GOV>
Sent: Monday, July 29, 2019 4:57 PM
To: ALJ <ALJ@SEC.GOV> [REDACTED]@optonline.net
[REDACTED]@optonline.net
Cc: O'Connell, Barry <OConnellB@SEC.GOV>
Subject: In the Matter of Edward M. Daspin. A.P. File No. 3-16509

Dear Chief Judge Murray:

Enclosed please find a copy of a letter addressed to your attention in connection with the above-referenced matter. The original and three copies of this letter are being filed with the Secretary's Office via UPS Overnight Mail, as reflected in the attached cover letter.

Respectfully,

Kevin P. McGrath

EX. K



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
NEW YORK REGIONAL OFFICE
200 VESEY STREET
NEW YORK, NEW YORK 10281

June 12, 2019

Honorable Brenda P. Murray
Office of Administrative Law Judges
U.S. Securities and Exchange Commission
100 F Street NE, Mail Stop 2557
Washington, DC 20549

Re: In the Matter of Edward M. Daspin,
A.P. File No. 3-16509

Dear Chief Judge Murray:

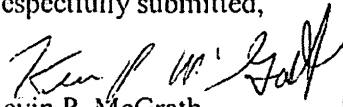
Enclosed please find a thumb drive containing electronic copies of the exhibits the Division introduced into evidence at the above-referenced hearing. For those exhibits that contained personal identifying information ("PII"), except as to certain bank records discussed below, we have also included a copy of the exhibit for public filing from which the PII has been redacted.

Division Exhibits 489 (750 pages), 490 (143 pages), 491 (319 pages) and 492 (101 pages) each consist of voluminous bank records, in the hundreds of pages, containing multiple checks per page. The amount of PII contained on each page is extensive and would require a substantial amount of time to redact. The relevant information from these documents has been summarized in the summary charts marked as Division Exhibits 493 to 504, which will be available to the public.

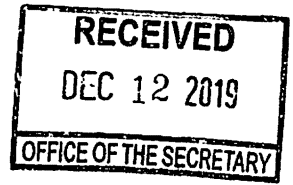
The Division submits that the harm resulting from the disclosure of this extensive financial PII will outweigh the benefits of disclosure of this information (particularly given that the relevant information from these documents is contained in the summary charts), and that requiring the submission of a redacted version of each of these thousands of checks will be unduly burdensome and serve no public interest. Accordingly, the Division respectfully moves, pursuant to Commission Rule of Practice 322, for a protective order limiting from disclosure Division Exhibits 489, 490, 491 and 492.

The Division served the Secretary's Office via overnight mail with the original and three copies of this letter (without the thumb drive) under separate cover.

Respectfully submitted,


Kevin P. McGrath

cc: Edward Daspin (by email, and UPS overnight mail with thumb drive)



UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-16509

In the Matter of

EDWARD M. DASPIN,
a/k/a "EDWARD (ED) MICHAEL,"

Respondent.

CERTIFICATE OF SERVICE

I, Barry O'Connell, hereby certify that on December 11, 2019, I caused the original and three copies of The Division of Enforcement's Partial Opposition to Respondent's Requests for a Free Hearing Transcript, Exhibit Copies, and More Time to File a Motion to Correct Manifest Errors of Fact to be served upon the Office of the Secretary by facsimile, to (202) 772-9324, and by UPS overnight delivery at the below address:

Ms. Vanessa Countryman
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-1090

I also caused a copy of the same document to be served on *pro se* Respondent Edward Daspin by email at [REDACTED]@optonline.net and by UPS to [REDACTED]

Dated: December 11, 2019
New York, New York

Barry O'Connell
Securities and Exchange Commission
200 Vesey Street – Suite 400
New York, NY 10281-1022
(212) 336-9089
oconnellb@sec.gov