

Edward M Daspin Pro SEE

[REDACTED]

[REDACTED]

RECEIVED  
JUN 29 2023  
OFFICE OF THE SECRETARY

case # 3-16509 6/29/23

Re: MOTION FOR RECONSIDERATION OF THE ORDER DISMISSING THE PROCEEDING & MY ATTENDANT DISMISSAL FOR NOT BEING A "CONTROL PERSON"

DEAR Ms Countryman Esq ;

Please distribute each of the five copies enclosed undercover to each of the five commissioners BEFORE YOU PLACE IT IN THE FILE FOR THE WORLD TO SEE!

The enclosed declaration has CONFIDENTIAL INFORMATION IN IT & I DONT WANT TO EMBARRESS ANYONE & HAVE GIVEN THE RIGHT TO THE COMMISSIONERS IF THEY TO COUNTER SIGN ORDER 2 TO NOT FILE THE ENCLOSURES.

IF THEY EXECUTE ORDER 2 AND REMIT THE COMPENSATION FOR MY SERVICES OF 13,000 HOURS' @\$350.00/HOUR PLUS INTEREST WHICH COMES TO \$5,000,000.00. I HAVE ALREADY CO-SIGNED IT GIVING RELEASES' TO ALL SEC & THEIR RESPECTIVE SEC WMMA [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

THAT PERJURY & COMPLAINT INITIATION MADE MY [REDACTED]

[REDACTED]

[REDACTED]

1/20/2022.

IN THE EVENT THEY SIGN THAT ORDER, WITH THE UNDERSTANDING THAT IF THEY DO NOT SIGN ORDER #2 BY 7/29/23 WITH AN ENCLOSED CHECK THAT REACHES ME BY 8/1/23 THEN YOU MUST FILE THIS MOTION, DECLARATION & EXHIBITS BY 7/29/23 AS OF THE DATE UPS SERVED YOU [6/29/23] AND YOU SERVED THEM

IF THEY CO SIGN ORDER #2 THEN AT THEIR OPTION THEY DON'T HAVE TO PERMIT YOU TO FILE THE MOTION, DECLARATION IN SUPPORT OF THE MOTION, OR EXHIBITS' OTHER THAN THE SIGNED ORDER #1 I THEY SO CHOOSE7 THEY WILL HAVE ALSOPOTECTED [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

Of utmost importance is the commissioners fencing with whether or not the prosecutions' other alleged wrongdoing ' about me were false!!How do they intend to give corrective action to their personnel if they purposely leave that pure unadulterated BS out?!! The evidence & the Res adjudicate given five years before judge Murrays self-serving attempt to justify the complaints' wrong-doing allegations about me with more B.S proves the prosecutors knew the B.S before they made those willfully malicious allegations in their Wells notice.

If the commissioners' refuse to address the disingenuous allegations' that killed my wife; then they can follow federal Judge Rosemary GAMBREDELAS' finding of fact in 2014 that:

..”Mr Daspin [& Mr Agostini] committed no wrong doing at WMMA”!

The absence of the definitive finding of all wrongdoing allegations' about me & Mr Agostini in our case leaves the impression that the commissioners' endorse the making of knowingly fake wrongdoing allegations devoid of providing internal quality control & of providing a complete adjudication after holding my case 5 years.

Respectfully [REDACTED]

[REDACTED]  
E-M Daspin Pro SEE/ [REDACTED]

Edward M Daspin Pro See

[REDACTED]

[REDACTED]

6/28/2023

Motion for reconsideration of this Commission order EX A ; dismissing

the proceeding against me for “no control deficiency”; without expressing a finding of my innocence of all wrongdoings alleged in the complaint. Just as federal bankruptcy judge Rosemary Gambardella in WMMAS’ 2014 found In WMMAS’, chapter 11 proceedings that :

. “ Mr Daspin committed no wrongdoings at WMMA. “

Without making a finding of fact adjudicating all the disingenuous allegations contained in the complaint against me with respect to my innocence of each & every allegation of wrongdoing & in the Wells notice, the OIP & the Complaint justice will not have been conferred on me by this Commission.. Such failure to do so leaves the stigma that the remaining allegations may have merit!! That violates my constitutional right to practice my private merchant banking business services to individuals’ needing it; because of the partial adjudication of the wrongdoing allegations made against me in the SEC’s disingenuous complaint against me’ .After 5 years of in house jurisdiction & 3 years of Commissioner appeal; it’s more than reasonable to expect a complete non qualified innocence judgement by you of me so that this declaration will give you the ammunition you need to pass on an unqualified opinion & if the Prosecution doesn’t accept the validity of my declarations’ representations they can make their objections known to you.

I declare under the laws of the United States that the foregoing statements are true to the best of my memory and knowledge. I know if I willfully misrepresent that im subject to punishment. I also warrant that my comments in EX B1 to judge Murrays fraudulent EX B2 first 14 pages of her initial decision are true. As if it is a declaration by me.

The Prima facia evidence I & WMMA presented & the 10,000 pages of documents we submitted in December, 2012. & the SEC witness testimony & depositions’ prove not one iota of wrong doing by me was true; that the prosecution knew the falsity of each and every allegation before they submitted the WELLS’, OIP & Complaint.! Their own SEC fraud analysts’ direct testimony proved that the prosecution, who held WMMAS’ financials’ for 3 years prior to their disingenuous Wells diatribe wrong doing allegations’ Testified. That I did not milk \$1,000,000 in fees from a start-up, causing it to go out of business.! She testified that.

...” Mr Daspin, CBI and MKMA collectively only received \$240,000 in fees from WMMA.”

The prosecution knew the falsity of their allegations’ against me were false before they made it .The books & records given them in 2012,3years before their Wells complaint notice proved I capitalized WMMA in 2011 with four. Million, four hundred and sixty thousand dollar[\$4,460,000,000.00]s and that I only received a portion of the \$240,000.00 that the SEC fraud analyst found was paid to me.,CBI and MKMA collectively en toto. That evidence also proved before the expiration of 2013 which also proved I

couldn't be a control person! Just as [REDACTED] 2013 SEC deposition disclosed that i was only a consultant with no powers' over the WMMA board members! The WMMA by laws' gave control to the WMMA board , not me the! The dishonest shareholder's meeting of 6/19/12 proved the SEC whistleblower, Ms Puccio , shortly after all [REDACTED]  
[REDACTED]

..."say ed CONTROLLED ALL SMALL&LARGE THINGS AT WMMA,,,& ill be the first to sign it.."

In fact the 23 defendants that this honorable commission dismissed for having no control is the fact that was ascertainable by the prosecution within 90 days after a complaint was initiated and which supports my plan: see exhibits C]

I labored over 13,000 hours to protect the Commissioners' from by developing its strategic litigation plan for the Commissioners to obtain a meaningful judicial review of the Wells dispute from a stand by federal judge before a complaint initiation& if implemented with only a few small changes to the current in house process ie; elimination of the commissioners first right to appeal of a case that they initiated a complaint with wrong doing allegations, providing the in house exclusive jurisdiction of all SEC cases with the defendant having the right to remove the reference to a federal district court if he/she wants a jury, with any in house adjudication subject to appeal to the federal district court for a bench hearing on the facts as well as the constitutional amendments alleged to have been violated if any, to counter balance the unbalanced discovery time giving the edge to the defendant if the plan isn't accepted , contact the commissioners before the advocates review is presented to the WELLS parties & perform a conflict of interest check & report each case in the manner the Commissioners' Secretary, Ms. Vanessa Cowboyman Esq, directs' to maintain confidentiality of all proceedings of the advocate[s] for each case & provide the commissioner in charge of each case of the advocates preliminary review for any commentary before submitting it to the parties at interest & only releasing it after the commissioners' form an opinion of complaint initiation ;so that the Wells defendants who were No Billed or Settled by the advocates opinions effect on the commissioner[ s]retain the confidentiality to preserve their respective standing in the country without the deformation that its publicizing harms WELLS innocent defendants before the commissioners initiate a complaint!

The Wells notice publicized prior to complaint initiation, the [REDACTED] prosecutions 'subpoenaing my wife's' bank records from her bank account ,ultimately killed my dear darling wife of 59 years on Jan.20,2022 from [REDACTED]'. The Ombudsmen will wait before any release on the commissioners' complaint initiation prior to entering it on the record.

The commissioners will after a direct review of the advocates meaningful judicial review which should only take an hour to read will therefor save precious time as its existence will save the examination teams' that the ' it seems use to recommend a complaint initiation in the first place. I project that the Sec will save about \$120,000,000.00 a year by not initiating a complaint against an innocent Wells defendant. I also assumed that 20% of the Wells defendants' NO BILLED OR ADVOCATE SETTLEMENT AFTER FIRST OBTAINING THE COMMISSIONERS CONSENT TO DO SO WILL SAVE THE DEORMATION THAT CURRENTLYCOVERS ALL WELLS NOTICE DEFENDANTS. You will also save the reputations of 80 defendants a year reputations.

The United states Supreme court has given this Commission two [2] distinct messages as in Lucia VS Sec and in Cochrane vs Sec; that it wont' tolerate the flagrant SEC in house violations of defendants

constitutional rights regardless of the Dodd Franks Act which was Congress intrusion on the United States Supreme Court. Despite those seeking to reverse the Roe vs Wade reversal, if not for that court we would have been a second-rate nation.

That courts' independence as granted in the Constitution will remain & its own standards of all is solely up to it, not Congress; as members of that court have risen to the highest moral & ethical standards in the world. If they like the company of billionaires so be it as their vote won't be partial to any of their respective friends' since their own reputations amongst their own justices is far more important to each than a fishing trip or airplane ride to a vacation hotel. Those members are entrusted to rule on issues that weren't in existence when our framers created our Constitution and so those justices' rulings including the composition of members on the Supreme Court and time changes for their membership is their sole & the LAW, not Congresses. In addition their reversal of Roe came with the understanding that each state can rule on whether they want to have abortions so no damage was done. I copied the Chief Justice on all pertinent declarations so that he would know the injustices performed in this in-house crucifixion. I know that you are not responsible & that you are the first commissioners with the courage to change the process which I'm sure my strategic plans distribution had some effect on some of the prior commissioners under the Trump administration as the last day before the Murray hearing was completed I talked to Judge Murray in the lobby of the SEC NY offices & she informed me she intended to stay on for another 10 years.

I therefore attribute her retirement before end of 2019 to have been because of my strategic plans information as well as replacing her with Judge Carol Feolak & I also understand that the delegation of adljs' have been suspended; but I'm not sure of that yet. Judge Feolak's retention of Judge Grimes as presiding judge has me very concerned since it was Grimes who violated Judge Feolak's protective order & Judge Grimes who informed a New York federal District Judge when that judge questioned Judge Grimes's knowledge of the two constitutional amendments that Judge Grimes used to buttress his opinion against one of the defendants that appealed Judge Grimes that Judge Grimes stated:

....."I don't know, but I did it anyway....."

Is this the type of presiding judge that should oversee the other administrative judges I think not as Judge Grimes will not pass the ethical standards administrative judges require nor obtain the judicial qualifications' needed to be appointed by the commissioners! If you would implement my Plan C or any modifications of it you make, you will be appointing an additional 5 administrative law judges over the next 18 months after my plan is initiated. I have agreed to provide you with the independent ombudsmen if you use MKMA, a private consulting corporation in business for 50 years & Mr. May assures me that he would let me and Agostini purchase an interest so that it will have the credentials with its hiring of 2 qualified professionals also offered ownership as a SEC knowledgeable lawyer and CPA with another 4 hires MKMA will have the experience to provide operating the other 7 regional SEC regions Wells initiated notices after the beta test, unless you wish to commence the initiation nationally as there can be no question that an advocate's independence of the SECS' meaning full judicial review pre-complaint initiation with the commissioners in complete charge to either No Bill or initiate a complaint regardless of the report will dramatically cure the conflict of interests & the constitutional violations of some of its amendments & in addition not encroach on the Article 3 judiciary's powers. All appeals will be held by a federal district court judge & with all complaints' initiated giving the defendants the right to motion a federal district court having appropriate jurisdiction for a "remove the

reference motion" to obtain a jury if requested based on the advocates report it may be in the defendants interest to obtain 2 bites at the apple as a federal judges' bench trial after the prosecution used up all its witness testimony may be of greater importance than a jury! Initially

Business mans review of the entity accused of defrauding investors ,if MKMA ,the we never sleep detective agency, is selected as ombudsmen, as it will give the advocate & therefore the commissioners on an indirect basis, if the advocate so decides, probably the best insight into what evil lurks in the hearts' of , as well as insight into what other person[s] & or entities deserve to have been investigated as tort feasers' , the investigative , the regional office & prosecutors' "blind spot" & their respective use of binoculars' looking at the Prosecutions' defendant to the exclusion of others that may have been the cause of the losses, fraud & other wrong doing allegations', the cause of the fraud and the controlling person behind the scene as macfarlane & Richter esq [REDACTED]

I & Mr May & for 7[seven]of the 400 entities, [REDACTED] as our partner, as he is 35 years' younger than we are with [REDACTED] who has a masters' in computer science purchase of 7 of those corporations and his administration of them plus his administration for 10 of his last 10 years of employment he administers' 350+/- employees &/or subcontractors' housed in the United states and an international affiliate collectively

My back ground is I was given a full scholarship for my Wrestling expertise and served as undefeated captain of the NYU university's wrestling team. After I graduated from college with a BA in psychology I started my first business; it's still running ,a day camp in New Jersey with over 500 young persons from 7 to 15 years old with a staff of 60 high school educators as counsellors',& using Volkswagen pick up and drop off for the kids thru north east N.J. My father was divorced by mom after 40 years of marriage .Mom had a masters In Psychology which was incredible for a 75 year old recently divorced woman to gain ; they didnt separated amicably as dad was a little cagy so that my mother wasn't able to get her half of the camp I built after college graduation. My father married a 2<sup>nd</sup> time and that's' the woman who was willed his day camp. It generates about \$2,000,000.00 ebitda per year for over 55 years since I bult &operated it.! Then i graduated from OCS & became an officer in the army when the Vietnam war started. After that army experience I got married ,started a family and commenced a private merchant banking business .

In that industry over 40 years 'I appraised over 10,000 corporations and i with on average 10 investor operating partners' per every 15 months completed over 350 acquisitions' out of the 10,000+/- corporations that i appraised for an acquisition with those 10 operating partners & or investors'. As a result I became an expert business appraiser as 4 federal bankruptcy judges' accepted my opinions as an expert business appraiser. During 1973-1975 I and my 3 equal partners rolled up the highly fragmented transportation industry acquiring 7 corporations' with about \$100,000,000.00 in revenue [today the equivalent of about \$500,000,000.00 in revenue .

Our holding corporation on a combined consolidated balance sheet had over 1,000 pieces of equipment .We made the acquisitions just after deregulation of the transportation industry. The last acquisition was of the stock of the corporation which in part had already before we purchased it been leasing trucks from a corporation we subsequent to the acquisition found had been being double billing the trucks' leased to it from the crooks who were double billing 2 trucks for every truck leased. That lessor was paying off our new corporations' terminal manager to look the other way as they only delivered half the

vehicles that they billed our corporation for. We decided to even off the theft by stretching the payments under the ; but it filed a chapter 11 before we evened off, the excess billing! At that time the truck leasing business had a 1 [one] year backlog so that when a receiver ordered the owners of our business to send the equipment back during Nov 1975 our partner s w two[2] of whom were lawyers opined that we weren't unsecured creditors and that fraud isn't dischargeable the d by a chapter 11. In addition the drivers of those pieces of equipment would have irreparably harmed the drivers who were union drivers who lived paycheck to paycheck and so could only afford the Christmas and/or Passover holidays' for their respective family 'members gifts; so the partners voted to conceal the equipment from the trustee. I was in a New York high rise office building between 53&54streets in the General Reinsurance building so I couldn't give the trustee the locations of the equipment of my life depended on it\ as our corporations subsidiaries carried freight from Bufalo to Florida along the east coast. But I was just as guilty of violating the law by concealment of some of that debtors assets. In fact i was one of the partners that voted on it , so we permitted those equipment drivers', all union drivers', to obscure the vehicles which was concealment of the DIP assets & we were charged with conspiring to conceal the DIP assets among other allegation. After 2 years in litigation in 1977 we settled and agreed to serve 6 months in federal prison. My web site up since 2006 discloses my felony from 4 decades ago & the prison term, still up today see daspinandco.com so you know the inference in the complaint " that I waited till the 11<sup>th</sup> hour to disclose my felony BEFORE an investor invested in WMMA is bs as the world knew it long before WMMA was incorporated in 4/1/2010 & since the first WMMA/WDI investors invested in June 2011! Only 20% of the WMMA employees invested hard cash and then only because WMMA figured out a way that the investors could use their pension funds without incurring a 100% penalty for early retirement.

After the telephonic or skype meeting they debriefed me that:

What Sullivan wanted to know was if I was only a consultant!?!& if so when would I leave headquarters to organize promoting regional promoters in the other 4 countries that would participate in WMMA's first tournament scheduled for 2012 year end!

██████████ informed me that they told Sullivan I was only a consultant& didn't know when I would be leaving WMA's headquarters to try to engage international promoters for the 2012 tournament add WMA project it in its PPM

[I did obtain by February 2012 enough promoters ,WMMA UK,WMMA BRAZIL ,WMMA GERMANY &WMMAUSA to have the first tournament for 2012 year end ;but the branding of WMMA was the reason for the 3./31/12 charitable event].

The company was bullet proof if not for the Macfarlane Newco enterprise fraud and theft proof if not for macfarlanes gross negligence & his participation of its theft of the 3/31/12 events assets.

██████████ 8/29/13 SEC deposition testified that:

...."Macfarlane lost over a million dollars as WMMA's president because of is gross negligence at the 3/31/12 event..".

The SEC fraud analysts direct testimony testified that;

..."Wmma lost a million dollars at the 3/31/12 event[the SEC alleged that I milked that million in fees i causing WMMA, a startup, to go out of business...that I,CBI & MKMa collectively were paid only\$240,000.00in fees from WMMA...that[ my wife] joan Daspin was shorted \$13,000.00 of the principal of her loan to WMMA[while she was also shorted the \$12,000.00 of interest at 3%simple never paid her]."

Can you beat the fact that the SECs own fraud analyst contravened that dribble that I milked a million in fees from WMMA causing it to go out of business as alleged in the WELLS OIP & Complaint despite the fact that the SEC had WMMA's books & record for 3 years prior to making disingenuous allegations to the then commissioners. But there is no question that commissioners' & Mary Joe White knew the falsity, knew the conspiracy against me by her own employees, knew the harm perpetrated against me, knew the violations of fraud made to federal judge Bachman to obtain a dismissal of my TRO which footnoted that I would be deprived a jury trial if I didn't obtain a federal district court jurisdiction if the SEC sued me; Ms White knew of the criminal enterprises that existed under her as I reported the prima facie evidence to her, the then Presidents under both parties & the Supreme court chief justice who could only wait until the appropriate time to take actions against such judicial inhouse harm as the SEC is under the Presidents power; but the law is under our great Supreme court.

The SEC fraud analyst testimony not only proved that the [REDACTED] prosecution enterprise members perjured my alleged wrong doings to fraudulently induced the commissioners' & its team to report that a complaint should be initiated against me & Agostini; but whoever that commissioner relied on failed to bring to that commissioners attention the criminal conduct of certain individuals under the commission against me, which not only went unattended; but a concealment conspiracy like my wrong doing in 1975 concealing a DIPS' transportation equipment from a trustees' knowledge put me in prison for 6 months.

I only violated [1] one act of wrongdoing; but in their house the then commissioners knowingly permitted concealment of the act that they were participating in the wholesale fraud of the in house defendants for 8 years before the Supreme court in Lucia vs SEC stopped the crime against the inhouse defendants' wrong doing allegations' with malice of forethought to also fraudulently induce the teams' that the commissioner in charge of my case should initiate a complaint in violation of the RES adjudicate of 2014 which was given by a federal judge 2 years before the Grimes/Murray default judgement while I WAS HOSPITALIZED & 5 years before violation of the Justices order in Lucia that:

..." no judge that participated in the prior hearings adjudication could hear the 2<sup>nd</sup> post Lucia hearing after being constitutionally appointed if the defendant objected. I motioned Judge Murray to recuse herself & she knowingly, with malice of forethought violated the justice of the supreme courts' order as there is no question she initiated and orchestrated the default judgement by violating the postponement sine die playing musical judge chairs after the prosecution failed to appeal Judge Feolaks' protective order in the time required; then she delegated Judge Grimes whom incredibly dissolved my protective & at the same time forced me to testify in 120 days from the order date! Judge Murray refused on my motion for her to reverse Judge Grimes dissolution order refused to do so despite the evidence that I was hospitalized as a result of my doctors order 7 my wife finding me in our [REDACTED] fortunately then speaking to my doctor who informed joan she had ordered me in writing to enter St Clairs hospital. After I was released in about 10 days & I & my doctor looked at the medication chart, found the medication switch accountable for the side effects of [REDACTED] on my prescription history. He had changed at my request just 2 weeks before the scheduled hearing; from [REDACTED] to stop the effects of



██████████ The Prosecutions expert, a psychiatrist failed to pick up the medication change which then Pfizer was being sued in Texas federal court for \$2.5 billion because of the Lyrica side effects of 1 out of every 500 patients either committing suicide or attempting to do so. However Pfizer's annual sales of Lyrica were \$250 billion a year at a GPM of 70%!!

The SEC prosecution tes

██████████, WMMA's VP public relations testified on direct that:

.. "Mr. Daspin voluntarily informed each interview candidate at his first interview about his felony and prison sentence ."

In return every WMMA employee received a Warrant in WMMA common stock which the WMMA projections' which Mains' direct testimony admitted he and ██████████ wrote for the WMMA PPM [Not as in the Wells that alleged I wrote the PPM projections & exaggerated them to defraud prospective investors to invest in WMMA], made only 1/10 of their projections by the end of the fifth year each of the lowest WMMA employees would have a \$3 to \$5 million capital gain on the warrant making no reason for anyone to invest hard cash; proving to me that the sole reason was to access their pre-100% penalty cash from WMMA or any competitor that would hire them whose program for its cash investors offered that benefit of it was a startup and couldn't pay compensation till it was cash flow positive. . MKMA had the same fee restrictions as no fee could be paid if in any month the fee was due WMMA didn't have incremental equity or pretax profit & then only 10% of that was allocated to pay fees leaving WMMA with 90% of its' incremental equity. The rest of the fee if any was a contingent no interest note subordinated to the deferred employee compensation so that the Goodwill could be booked on WMMA's balance sheet; but the fee which was deferred was contingent and therefore meaningless as it was subordinated, non interest bearing & contingent payout!

... " he and Sam Troppelo wrote the WMMA ppm projections' ."

despite the Complaint alleging that:

... " I wrote them & that I exaggerated the projections in the ppm to defraud potential investors to invest in WMMA.."

The prosecution already had ██████████ new Google December 2012 chartis insurance claim wherein ES for \$1,000,000 for work he did for WMA and in is charters insurance claims paragraph 6 he admitted:

.. "I wrote 100% of the WMMA ppms"

. In ██████████ WMMA chapter 11, he declared that:

"he was present at each interview I had with WMMA investor applicants' and I always voluntarily disclosed my felony & prison term at my first interview voluntarily "

Its on the internet website under [daspinandco.com]

i also signed each WMMA employment contract that WMMA/WDi signed off on & I signed off for MKMA as MKMA agreed to permit the WMMA employees, if they wished to work as WMMA subcontractors FOR MKMA UNTIL WMMA's tournament started & share a pre agreed portion of MKMA's fees which

MKMA agreed to let WMMA deduct from its payment to MKMA so WMMA could pay its own employees. .

In my cross examination in the face of Judge Murray of [REDACTED], who were the disinterested majority directors of WMMA and admitted that:

..." they JOINTLY CONTROLLED WMMA & DID N'T USE ANYONE ELSE'S OPINIONS' anyone else's opinions to decide whether to hire an employee or permit the employee to invest."

[REDACTED] WMMA chapter 11 declaration lied when he declared he didn't participate in WMMAS' ppms work in progress as my reply declaration attached his contract which specifically requires that:

..." he as WMMAS' PRESIDENT MUST REVIEW ALL WMMA PPMS' make 'corrections, eliminate any non provable allegations and add or subtract paragraphs' that he believes are important."

! As previously indicated who was absolutely no pressure involved in fact the SEC admits that Mister how's the camp [REDACTED] perjured the respective subscription warranty alleging they were accredited when the SEC informed the defendants after they fraudulently induced the commissioners to initiate a complaint against me that all three of those investors [REDACTED]

..." Mr. despina committed no wrongdoing at WMMA..."

[REDACTED] when their attorney miss [REDACTED] suborned their respective perjury and their declarations in opposition to my motion to dismiss the WMH drill the only [REDACTED] and the aforementioned admitted in his Brady that I voluntarily disclose my felony at his first interview with me but [REDACTED] attended the dishonest shareholders meeting of 6/19/2012 it was a conspiratorial meeting wherein all the WMA and WDI investors conspired to fabricate and suborn perjury[see my Welsh reply exhibit A page 17] on it miss Puccio directs them to:

..." Sayed controlled all small and large things at WMA.. Don't say that red controller WMA board of directors because he denied that in writing to all of us and I'll be the first to sign it"....

Puccio was the SEC whistleblower and as I found out subsequently the SEC made the other six WMMA investors covert whistleblowers because it needed the testimony of an allegedly independent investor to be able to allege that I was a control person; since all the investors were bribed by the prosecution as is evidenced in judge Murray's October 16th to 2019 initial decision ;we're in near the end she directs the prosecution, after they collect the judgment from me ,to distribute it on a pro rata basis to each of the SEC whistleblowers who were the WMMA investor operators"

.During that period if the Beta test is to your satisfaction unless you go full out to implement the Plan as modified to your liking & then it will take the ombudsmen the entire 2 years to obtain the other 7 regional Ombudsmen's offices so that the in house WELLS advocates opinions will be given In each SEC jurisdiction. The Advocates can work out of their respective homes. From the time you make the call it will take the remainder of the 2<sup>nd</sup> year for the chief administrative judge and a commissioner[s] to select another 5 qualified adljs as unless a "removal of the reference motion "is made only adljs' will adjudicate all SEC matters' as in my plan.

I project that after the first 50 cases using the Northeast region for the Beta test & Ombudsmen's headquarters' staffed by the 2<sup>nd</sup> & 3<sup>rd</sup> circuit's Presiding circuit judges will supply the initial recommendation of stand by federal judges available & if selected either they or the presiding judge[s] will also provide the names of the 2 SEC knowledgeable law clerks. My projections approximate about \$500,000.00 of 1099 compensation for each advocate & 50% of that for his/her 2 SEC law clerks' ie \$250,000.00 for each law clerk as their performance bonus protections are included and represent half of the advocates bonus for each law clerks efforts if they sign on for 12 months..

In addition the law clerks will have first call on staffing each of the 8 regions of the ombudsmen's' offices with 1 SEC law clerks trained to staff each office & base annual compensation approximating \$250,000.00 a year plus performance bonus and ownership as [REDACTED] & I will leave when the entire infrastructure of the startup is completed. [REDACTED] will continue on as the ombudsmen's Chair & majority owner. His expertise is currently administrator & for 10 years also the corporations controller of all operations' of an approximate 350 person +/-, computer programming & development corporation, operating from 2 international offices. He has a Masters in Computer Science and has administrated and co-operated over 5 corporate entities for the 7 years' he was a partner with me & other senior executives that he co invested to own with us each of the holding corporations subsidiary's ,one [1] of which had over 40 senior executive officer partners' ,who were officers of fortune 500 entities while not once; not resolving peacefully any issues brought to his attention by his implementation of a team effort under his command. I vouch for his honesty, brilliance & expertise to operate the Ombudsmen. The ombudsmen will be MKMA, only if you desire .

My case demonstrates that your predecessor commissioners' didn't have that expertise nor the teams below them as the team they used, if they did their job right would never have recommended initiation of a complaint against the defendants in case 3-16509! That is in part proven by the facts that your prosecution team had to concoct each and every allegation of wrong doing against me which they knew WMMA's books and records proved wrong ! In addition, they had to bribe the investor witness to suborn perjury with each other as the WMMA chapter 11 declarations of MAIN, Sullivan, Berjedeckian and Macfarlane proved to Judge Gambreddela and trustee Guardino else they wouldn't have found that:

.. "Mr Daspin committed no wrong doings at WMMA..",

A RES ADJUDICATE 5 YEARS BEFORE JUDGE MURRAY'S VIOLATION AND ONE YEAR AFTER THE JUSTICES LUCIA ORDER, & 3 YEARS THE VIOLATION OF JUDGE FEOLAKS PROTECTIVE ORDER & THEN RES ADJUDICATE!

The prior commissioner s knew the facts but refused to stop the crucifixion!

The Prosecution also kept the other [REDACTED] only admitting that the 7<sup>th</sup> whistleblower Ms. Puccio was overt. It's disgusting the crap that your predecessors perpetrated by permitting [REDACTED] to bribe the very investor/operators who with William Macfarlane caused the destruction of WMMA. The Macfarlane enterprise members' in co-conspiracy with the [REDACTED] enterprise members that the Murray enterprise members joined to frame me could only perpetrate the criminal and civil conspiracy while the then commissioners that I kept informed permitted such mal conduct to flourish in their own jurisdiction.

I DISCLOSED TO THEM & WITH PRIMA FACIA EVIDENCE that each of their investor/witness, whose perjury their prosecutors' enterprises they had suborned as proven the WMMA books and records ,Larry Luxs' SEC depositions testimony which on 8/29/13 proved that I was only a consultant having no power over the WMMA board members and or any WMMA employees.

In addition the 1/15/11 contract for my wives' sale of her 90% control of WHLD common to the 3 WMMA board members [LUX,MAIN,AGOSTINI]& my CBI corporations 1/20/11 sale to MKMA of its WMMA 5 year consulting services contract making it & me a subcontractor of MKMA while eliminating my right to provide any services to any MMA ENTITY INCLUDING WMMA for 5years which was in the WMMA board of directors resolution signed by all WMMA board members &the contract specifically disclosed that MKMA had no power to bind WMMA which I as a subcontractor of MKMA was also bound proved that I had no control & that no claim alleging i was a control person could be made or found except by a co-conspirator who wanted to frame me. They couldn't legally since WMMA's books proved I wasn't a WMMA officer , director or shareholder until after all the WMMA investors lost their own WMMA equity with the MACFARLANE ENTERPRISE MEMBERS OR PARTICIPATED IN THE THEFT OF OUR CAPITAL.

DUE TO YOUR ██████████ PROSECUTIONS' enterprise participation with the macfarlane Newco enterprise members co conspiracy early on I LOST THE \$4,460,000.00 OF CAPITAL that I AND Mr may inserted into WMMA during 2011![SEE the DEC 8,2011 WMMA 3 board of directors' members resolution's' accepting this capital & the related party forgiveness by CBI ,my corporation's million in fees for the IMC contract I negotiated for WMMA in 12/15/10 thru CBIS' 5 year consulting contract with WMMA. The aforementioned proved that we committed no wrongdoing against WMMA.

I proved that the SEC investors slipped up as they contravened their prior testimony or actions' in the WMMA chapter 11& in the dishonest shareholders meeting of 6/19/12 in which [SEE my Wells replies' EX A page 17, wherein ██████████, the SEC whistleblower suborned the perjury of the WMMA/WDI investor operators when she directed them to say that:

....."say ed controlled all small & large things at WMMA. .don't say ed controlled the WMMA directors because he denied that in writing to all of us..& ill be the first to sign that.." That dishonest shareholders meeting was after all those investors had been briefed by the SEC New York regional offices being advised that they were all going to receive a pro rata portion of any judgement that the SEC obtained against me right after Puccios' subornation of the investors perjury !

██████████, on My Wells replies' EX A page 17 transcript responded stated:

....'But Teresa we already gave them [the SEC] all that stuff"

[ie; the alleged control allegations which was part of the SEC N Y regions strategy which i was informed by Lockett before he died when Lockett needed me to submit his claim for fraudulent inducement by Puccio as his Chartis insurance claim since Ms.Puccios' resignation letter on 8/2012 alleged that she & Sullivan & Berjedeckian knew WMMA was a Ponzie scheme in DEC 2011; while interviewed Lockett in Jan 2012 & didn't advise him of that alleged WMMA Ponzie scheme fact! Ms.Puccios lie was proven by her 3/27/12 email ██████████ copied to me & to the WMMA board informing him that on 3/27/12 she invested \$500,000.00 into WHLD of its' common of .89%, just 3 days prior to the WMMA charitable event 3/31/12!

I also proved that That macfarlane ,his lawyer Katherine Richter esq. suborned his and the rests perjury when she prepared eachs' declarations' in the WMMA CHAPTER 11 OF 2014. Ms Katherine Richter ESQ was his lawyer & she prepared MAINS, Sulivans, Berjedeckians' & macfarlanes perjurious declarations before the WMMA chapter 11 bankruptcy court knowing they were perjurious[judge Murray paid off the bribe in her initial decision of oct !

Your predecessor's DID NOTHING TO protect me despite knowing that their own chief administrative judge & prosecutors were crucifying me, by virtue of permitting the aforementioned and below mentioned conduct despite their knowledge that they permitted all the in house adljs to violate the appointment clause for 8 years & with malice of forethought permitted judge Murray to crucify me with judge Grimes violating my protective order while the 2015 WSj article proved that judge Murray pressured the adljs' to" find more cases for the prosecution" and to violate my life by switching judges for no reason in my case after judge Feolak adjourned me from participating in this case in 2016 by Murray switching judges after the prosecution failed to appeal Judge Feolaks' order & finding of fact that:

...." If anyone forced Mr Daspin to testify he will be irreparably harmed"

Judge Murray switched judges to Judge Grimes from Judge FEOLAK FOR NO REASON STATED He was the same judge Grimes that judge Murray switched to become her presiding judge after her the then current presiding judge judge, Cameron Elliot refused to lie when the adjudicatory division directed that he submit an affidavit to the WSj declaring that he never heard judge Murray pressure Judge McEwen

.." to find more cases for the prosecution "by judge Murrays pressure on former Judge McEwen as former judge McEwen declared to the Wall street journal in 2015 that:

.." Judge Murray pressured me to find more cases for the prosecution"!

The WSJ article was written by Ms. Eaglesham:

"SEC WINS BIG WITHITS IN HOUSE ALIS"

In that article it discloses that Murry pressured judge McEwen to find more cases for the prosecution! Murrays' adjudicatory division directed Elliot to contravene judge Lilian McEwens' declaration that in effect: judge Murray pressured McEwen to:

..." to fix cases against defendant's" .

Elliot than sent a note to the wsj:

..."I will never submit an affidavit in this matter."!!!!

WHAT DID THEY THINK HE WOULD DO? ADMIT HE AIDED MURRAY TO FIX CASES.."??

Fixing cases in the United States is a serious crime that deserves imprisonment, not a self serving inspector generals' report alleging that the proof against Murray was insufficient! My case proves judge Murray & the Gross negligence and co-conspiracy of Mary joe White who permitted Murrays' continuing violation of my protective order despite the finding of fact by judge Feolak that:

..."if anyone forces Mr.Daspin to testify he will be irreparably harmed"

& after My doctors deposition that also disclosed that if I am forced to testify that :

..”Mr Daspin could die if forced to testify”!

I copied on my declarations to the then commissioners& the others I referred to above that I copied. I received not the slightest aid which drove my wife to further drink which hastened her death!

Joans undergraduate and masters were both Suma cum laude in Psychology & Statistics. She also was an adjunct professor in Psychology. Then the CEO of ATT, the largest corporation In the world at the time hired her to provide H R services to test those executives seeking top positions in the soon to be given the keys to the mini Bells controls.(90 % of joans’ testing winners;, which she flew all over the United states were accepted by ATT.) Her direct Boss was Charles Brown. ATTS’ CEO. This is the lady that this co-conspiracy killed during the 7years joan & I lost over\$2,500,000.00 of our assets and net worth because despite the proof by prima facia evidence proving my innocence & the incontrovertible proof that I wasn’t a control person, & despite the RES adjudicate & the protection of Judge Feolaks’ Postponement sine die; Judge Murray & didn’t relent, didn’t nor back off & neither of those Neanderthals or the commissioners stop the crucifixions of an innocent defendant which also proves that the prior commissioners were contacted by the 2 divisions that my declarations proved were sadistic coconspirators ;yet I never received any contact nor was their behaviors’ stopped. The prior commissioners knowing that the law of the case proved that:

...”if anyone forces Mr Daspin to testify he will be irreparably harmed, “

& the RES adjudicate meant nothing to them nor did the Lucia order barring judge Murray from hearing my case a second time violating the justices of the supreme courts order.” The New Presiding judge was switched to my case for no reason except to frame me ,to circumvent judge Feolaks order of the law of the case and expose me to death because the SEC rule 300 disfavors adjournments!!

And in the face of the law of the case this Judge Grimes dares to dissolve my protective order using at first he declared that:

..”the wrong doing allegations in the OIP made me do it”:

”ie dissolve the protective order knowing I had had a from the first deposition by the SEC mid way thru it my blood pressure went up to 220/110! My doctor stopped the deposition and I needed to get it down to 120/85. I motioned for judge Murray to reverse judge Grimes dissolution order and hisforcing me to testify in120 days.

Of course, that was useless as she was in on it, created it!, after she removed the case from judge Feolak for no reason stated to him! judge Grimes ordered that all orders remain in place which included my protective order. Then when Judge Murray and Grimes had the time for exparte discussions’ they conspired to fix my case, disregard the protective order and judge Grimes reversed his initial order and dissolved the Feolak protective order. Then [both judges] they changed judge Grimes initial reason for this dissolution on the record and he substituted a new reason ie:

..’I dissolved the protective order under SEC rule 300 which disfavors adjournments”

Judge Grimes first reason was:

..“I dissolved the protective order because I read the OIP allegations of wrong doing”

I pointed out that made no sense to Judge Murray as those OIP allegations hadn't yet been adjudicated or opposed by me ,put on the record, nor the merits discussed!

She advised Grimes to change his reason but the 2 of them made laughing stocks out of this Commission.

Judge Grimes erased his first reason from the record with judge Murrays'acquiescence & he replaced it with that equally absurd disingenuous reason that SEC rule 300 disfavors adjournments.”

[But that rule doesn't place a defendant jeopardy of death if the protective order was dissolved& neither of those 2 comedians could violate the finding of fact nor the protective order without a hearing which I never received. How can you permit Judge Grimes to remain as a judge knowing he hasn't demonstrated that he has the ethical standards required & he didn't follow the law of the case & he admitted in an entirely different case being appealed before a federal district court in 2016 in New York ,NYC that he didn't know what the 2 constitutional amendments' he used to find guilt of that defendant stated :

.....” But i did it anyway”!!! t??

Judge Murrays participation in playing musical chairs after the prosecution failed to appeal judge Feolaks' order in the time requirements made her q member of the prosecutions team”!!

The WSJ article of 2015 proved that the 3 year average ending 3/31/15 proved that in house the adljs found 90%of defendants guilty while during the same period with the approximate same amount of cases before the federal district courts SEC cases findings found32%of the defendants innocent !!!! bet that at least 17%more defendants that were innocent& settled because they were about to run out of money which indicates that the current complaint initiation is defective & costing this commission aboutanadditional\$2millionper about80Wellsdefendants that our advocate & Ombudsmen would catch the errors& you would save those innocence saving this commission 80 time\$1,500,000.00 per defendant no Billed or pre complaint settled by the commissioners review of the advocates preliminary report & his recommendations that of a settlement with the amount and reasons before the advocate talks to the defendant's counsel! as it's the Commissioners control over the entire advocate and ombudsmen's performance.

If the Commissioners approve it than that is also a pre complaint initiation success 80 times \$1,500,000.00 per year =\$120,000,000.00! Thats preservation of this commissions resources and the reputations of those defendants' remains clean as the advocates 7ombudsmens work product is completely confidential unless the commissioners initiate a complaint &then it's a,part of the record.

It cost me a million for my initial law firm but after they saw the, Murray musical chairs they knew the case was being fixed & they motioned to be dismissed from my case leaving me to be a pro see or face a default judgement .I had to & have to live up to my promise to joan so despite possible death from another heart attack I will complete my promise so when i join joan she knows i finished the right way. Trying to clean up the deformation of our name and obtain the fruits of my labors of13,000 hours to

assist this commission to turn around the in house process & to restore our estates asset for those we love..

Your prior Commissioner[s] & whoever controls them for the President are playing with peoples' lives & should be hanged! If you read my EX B1, the declaration I made with respect to judge Murrays oct 16th 2019 initial decisions first 14 pages marked exhibit B-2 you will realize that each and every statement of alleged fact Judge Murray made or in the case that its obvious that the prosecution was her ghost writer for about 30% of her initial opinions' first 14 pages made either came from investor /operators' that were proven perjurers' ,or from concoctions' of alleged facts emanating from the minds' & the knowingly disingenuous allegations contained in the Wells, OIP or Complaints wrong doing allegations which was contravened by the facts ie:

I was accused of milking WMMA ,a first stage startup of one million in fees. The Books of WMMA delivered in Dec.2012, before the WELLS notice proved that i, CBI,MKMA collectively only received \$240,000.00 which is exactly the amount permitted under the 1/20/11 WMMA/CBI/Daspin/MKMA service contract for 5years calculates to the additional fees were all capitalized by me and then MKMAs assignment of my work product which totaled over\$4,460,000,000.00capitalization by me, CBI& MKMA fees as disclosed in the related party section of the7/31/11WMMA ppm & the WMMA board resolutions of DEC 8,2011!As it was a 506 REG D PPM which made WMMA's offering of its shares an exempt securities transaction & which the SECs stamp on oct 10,2011, proved the securities were exempt under reg 506 D!

The SEC no right to sue us except by concocting fake disingenuous wrong doing allegations which they knew before they concocted the allegations were untrue which they gained by subornation of perjury by their own SEC whistleblower as in my WELLS reply EX A, page17!The SEC bribed those perjurers concealing the fact that Six of the seven investors were whistleblowers. WMMA hired in total 40 employees over the term of ITS activity, only 7 were Investors& all 7 were whistleblowers that were covert and not disclosed in the Brady ;so that only judge Murray knew that the SEC witnesses hat were WMMa/WDi investors had a financial interest in lying .. The WMMA investors were promised their respective pro rate portion of the judgements' judgeMurrays doled out against me. Judge Murray's initial decision directs the prosecution to collect the judgment and then distribute it on a pro rata basis to the seven investors! This case was fixed from the beginning to the end from the time the investigators started directs the prosecution till they collect it from me! From May 2012 until now which is more than 10 years', I have not been able to practice my merchant banking business because I have a fiduciary to inform prospective investors from the time the investigators notified me that I was a SEC target in1/2013! I therefore disclosed it to all Prospective joint venture investor partners that I'm being investigated by the Securities and Exchange Commissionfrom2013 until then after it's a matter of public record when you actually filed A complaint against me so that the world thought I was a bad guy despite the fact that after I was released from prison in 1978 it took me 40 years to clean up my reputation. I ask you to keep this in mind .

Im now 85 and I asked this Commission to permit me to finish the balance of my life with a clean record & with the estate I and my wife owe our loved ones because of the co conspiracy effects on my family my wife lost her estate of over\$2,500,000.00& I lost my ability to generate the \$8,500,000.00 that I averaged over every 5 years from 2007 to 2012! Payment of my compensation will also provide for our loved ones which this Commissions employees stole from me; instead of my being forced they have to



sue the two enterprises that worked under this commissions Aegis!. It took me 40 years to clean up my reputation and then this Commission, after I was released from prison in 1978 with no recidivism for 40 years ,until the prior commissioners let the [REDACTED] enterprise frame me with the co conspiracy of Judge Murray& Grimes alleging the securities were non registered when they already stamped by the SEC on oct 10,2011as exempt securities, by the SEC ,under the rule 506 reg D!

The world thought I was a bad guy after I had cleaned up my reputation from the 1975 mistake I made by not reporting he trucks potential whereabouts as we had no computers in those days I was honor bound to inform any potential partners that I was being investigated by the SEC in the beginning of 2013 when the SEC notified me I was target.. So for10 years I wasn't permitted to practice to earn a living over a framed prosecutions' disingenuous suborned perjury witness who were also bribed& covert whistle blowers except for Puccio who was the admitted whistleblower.

Judge Murray& [REDACTED] et al, defrauded federal district judge Bachman by omission of the material fact that all of the in-house judges were constitutional violators of the appointment clause! That all of the in-house judges were constitutional violators of the appointment clause. As a result the conspirators stole my \$1,000,000 litigation bond by conning judge Bachman . After stealing my \$1,000,000 litigation bond by putting me before the in-house process by conning Judge Bachmann. I did receive four months of relief because in honest brilliant judge Carol Feolakadjourned me from participating in this case based on 2 1/2 months because Anand's brilliant judge. Of review my doctor's reports Heron Carol Folich. Which proved adjourned. As fact that if anyone forced me to testify I'd be irreparably home unfortunately it was short lived because the SEC had a crook at the top as the chief administrative judge judge Brenda Murray who played musical judge chairs to get rid of judge folic which proved and delegated Judge James Grimes as fact that any search Grimes violated my constitutional rights as did judge Murray by violating the protective order and he dissolved it and forced me to testify and judge Murray refused to reverse that order proving that she initiated as the chief administrative judge, Judge Brenda Murray, and orchestrated the default judgment fortunately the United states Supreme Court intercede and Lucia versus SEC And delegated Judge James Grimes. Church crimes. And on August 2018 Violated my constitutional rights as. That you ordered and I receive a new trial and voided the default judgment however they're order prohibited any judge from hearing the second case if that judge participated in adjudication of the first case and if the defendant objected I objected to judge Murray I motioned her to recuse herself and she refused she forced me to testify in 2019 orchestrated the default judgment despite the fact that she knew and participated in the criminal conspiracy the bribe the investor operated WMA witnesses whichever initial decision proves she knows that we're all perjurers it was proven on the record yet she chose to disregard the prime aphasia evidence the rest of judaica and instead that was proven on the record. Use the suborn perjury of the SEC witnesses in fact right in front of judge mark and my cross examination of [REDACTED] and missed the main they admitted:

..." the born perjury of the SEC witnesses. That day jointly controlled WMA.. Without using anyone else's opinion they selected who the employees would be and they permitted certain of those applicants to invest And my cross examination of [REDACTED], they admitted. And WMA"

judge my renew I had no control Despite that she found they committed scientific that I had knowledge of wrongdoing now my conduct proved I had no knowledge of any wrongdoing because I permitted my wife to loan on an unsecured basis and advance over \$515,000 to WMA WMMA. Which the beneficiaries upper alone in advance the WMMA entities we're all startups and their respective private placement

memorandums proves that they were all losing money! What husband married for over 50 years would permit the wife that he loved for that period of time to invest some of her savings if he knew of any wrongdoing? What man who with [REDACTED] collectively capitalized over \$4,460,000,000.00 of WMMA with our deferred fees would capitalize a company that they were &or intended to commit wrong doings against??! Would anyone with a brain do that if he knew WMMA was infiltrated with wrongdoings?.

Despite the facts' judge Murray found that i committed Scenter! That proved to the independent fact finders that Scenter was committed by the dishonest shareholders who conspired with the macfarlane newco enterprise members who collectively conspired with the [REDACTED] enterprise members who co conspired with the Murray/Griimes' enterprise members and some of the prior commissioners' & or their respective teams that refused to inform them of the torts I reported on a continuous basis from 2016 on if these Commissioners that i directed my declarations to refused to open their mail and or read the record of case 33-16509!.. The decisive fact occurred in the WMMA Chapter 11 in 2014 in which both judge federal judge Gambredella & Trustee [REDACTED] found as fact that:...

..”Mr Daspin committed no wrong doings at WMMA..”.

Despite that, she found they committed Scenter ;that I had no knowledge of wrongdoing.

Judge Murray knew I had no control she heard my cross examination of the 2 majority disinterested directors [REDACTED] & [REDACTED] on separate days admitted that:

..” we jointly control WMMA.. We jointly controlled WMMA. ...we did not use anyone else's opinion when we hired and permitted investors to invest in WMMA “

In fact we did not need that cross examination testimony That gross examination testimony. As six years before on On. 8/29/13 829 13. When [REDACTED] had his first SEC deposition When [REDACTED] his first SEC deposition. He testified that:

..” Mr. Daspin was only a consultant. He was not a shareholder, officer or director of WMMA... Daspin gave the WMMA board of directors reports only if a director invited Daspin to attend a board meeting...in that case no directors had any obligation to accept or deny Daspin's advice if asked for it.” By using that contract.

[REDACTED] Brady recantation to which he attached his answers to the OIP declared that.

..” he wrote the entire WMMA MKMA, 1/20/115 year service contract by using the Chamco service contract as its template “

!That answer contravened in its entirety the Complaint and Wells allegation that I disguised the Investment banking fees as if they were HR Fees to circumvent the Exchange acts licensing requirements! In addition he pointed out that he used Chamco service contract as the template and The WMA service contract was almost identical to Chamco! He also pointed out that on 12/31/ 12 federal bankruptcy judge Theodore Albert found using the Chamco service contract that I committed no federal or state security law violations when I was receiving fees from Chamco[see my Wells reply exhibit C ,for the chamco innocence finding] Despite Spy every word judge Murray found me guilty of violating the exchange act.had Judge Murray use the Lehman formula as the average investment of the seven investors was \$360,000 and at 5% of the first million or fraction thereof the fee would come to \$18,000 however the HR fee and the WMA service contract was a minimum of 25,000 dollars or the greater rough 25% of

the first year's compensation the first year's compensation for all investors was 150,000 times 25% equals \$38,000 .even a lunatic wouldn't this guys an investment banking fee as an HR fee when the HR fee calculates to two times greater than the investment banking fee!

In admission [REDACTED]' Chartis insurance claim of DEC .2012 for \$1,000,000.he points to his being the author of WMMA PPM as in paragraph 5 Mr. Nwugugu admits that:

..” I wrote 100% of the WMMA PPM”

In paragraph 5 [REDACTED] admits that:

..” I wrote 100% of the WDI PPM”

I Despite Mr. magoos aforementioned declaration the complaint alleges I was the author of the WMA PPM and as a result they allege I was responsible for any omissions of material facts the only contribution MK MAN I made was contained in the service contract we executed with WMA on 1/22/12 to 11 which declared that we provide strategic planning human resources deal making and negotiating services and any other services requested by MK MA and by the WMA board of directors are charged out at our hourly rate of \$350.00 an hour contract also bars MK MA from receiving any fee in excess of 10% of WMA's monthly incremental equity and pretax profit with the remainder if any as a deferred contingent not interest bearing subordinate note

The [REDACTED] enterprise prosecutors and their respective members' made allegations of my wrongdoing and by some of the SEC's own witnesses ' ; which were contravened by WMMA 's books and records' and by some of the SEC's own witnesses Disingenuous Machiavellian alleged facts,

THEN IT GETS BETTER

To clean judge Murrays reputation up after the WSJ articles implicit fact that Murray fixes cases by pressuring her own adljs' to find more cases for the prosecution a fact which her own presiding judge at the time was directed to submit an affidavit to the Wall Street journal [WSJ]obviously to contravene Judge Mc Ewens' declaration attesting to that fact. Commissioner Mary joe White enlisted the aid of the Inspector General who investigated the allegations' in the Wall Street Journal of former administrative law judge Lillian McEwen when she told the WSJ that judge Murray:

...” pressured me to find more cases for the prosecution.”

Commissioner Mary Joe White & her successor I assume permitted 2 of its adljs', Judge Murray & Judge Grimes[or for those years judge Grimes hadn't yet arrived in house judge Cameron Elliot it appears that he played ball with judge Murray until he was forced to submit an affidavit to the WSJ in 2015 which he refused to do. defrauding approximately 23% of each's 25 defendants' per year for 6 innocent defendants that were innocent like me.

With the above assumption is the duo found 12 innocent defendants guilty per year, so that their adjudication of innocent defendants as guilty amounted to 72 defendants over the 6 prior years. Using that the duos percentage out of the 150 cases the supreme court voided the guilt adjudication represents almost half instead of the 40%! Both Murray & Grimes took about 60 rehearing cases so that on average assuming both judges persisted in conspiring to frame innocent defendants equates to 14 of the 23 defendants this Honorable commission found innocent due to “no control deficiency”!

Assuming I have to continue to live up to my promise to Joan, unless this Commission agrees to compensate me for my hourly rate of \$350.00 per hour, would not be in this Commission's resources preservation of its assets interests. I believe that this Commission should consider compensating me based on this declaration's veritas as well as EX B1 & C Veritas. If I am forced to file a federal RICO lawsuit against the SEC employees that fixed innocent cases as mine, I would expect that after I solicit those 22 dismissed cases, I will find more than 2 predicate acts of fraud, co-conspiracy violations of 13 of their constitutional rights' as in my case a second time. That's a class that could amount to over \$325,000,000. Treble in damages as my case could amount to \$25,000,000.00 by itself against the prosecution enterprises alone. Judge Murray's initial finding EX B2 3E finding of fact by Judge Murray found that:

.. "I very very smart"!

Put yourself in my shoes. I know that I only had one love in my life. It was Joan who we lived together for 62 years, were married for 59 years and she died as a result of the [REDACTED] enterprises' deformation of our name by violating our constitutional rights' suborning [REDACTED] with the judges Judge Murray steered my case to etc with the Murray /Grimes co-conspirators! Wouldn't you seek retribution for the death of your spouse? I know each of you would so please do the right thing as although I'm getting tired of what predecessors permitted to happen to me and Joan my background of being an undefeated wrestling champion at NYU, & my service as an officer & tank commander plus the fact that I never lost any of the 50 cases that I was *falsely* accused of being a tortfeasor & the fact that I must make good my promises to Joan, means that I respectfully request that you respect me as I respect you and that you sign off on order 1&2 please

EX B2 is Judge Murray's initial decision of her first 14 pages. EX B1 is my proof that Judge Murray's findings in B2 were not based on prima evidence; but rather on all sorts of fake allegations, suborned perjury & HER disregard of the witness admissions at the 2<sup>nd</sup> hearing etc, etc prove HER B2 defense of her alleged findings' proves that not one finding by her was just; but rather all were void of justice while she disregarded the Prima facie evidence while finding her disingenuous initial decisions' fake findings' of alleged facts that were obtained by subornation of perjury, perjury & bribery etc. taints the SEC reputation. B2 also proves that she never repented from fixing cases against defendants after the Supreme Court's Lucia Order. It should have made her recant her criminal behavior. But her first 14 pages proved she was the same old, same old, fixer of cases against innocent defendants. The only way to stop this is implement my EX C as you modify; but in principal so that you will get an independent meaningful judicial review pre-complaint initiation.

In my case all 3 of us were innocent which is also proven by the prosecution settling with [REDACTED] for no money, & settling with Mr. Agostini for a payout of \$25,000.00, while after they put on their case they offered me \$40,000.00! What prosecutor believing guilt would walk from the case for a total of \$65,000.00 when they alleged that I owed the investors based on their trumped up charges \$2,400,000.00?? They always knew that we didn't do one act of wrongdoing, but they helped MacFarlane escape. MacFarlane was Senator Mitt Romney's South West Presidential Fund Raiser Manager when he ran for President and I believe that that's where the leverage to use the SEC for the bank robber came from. From his leverage I became MacFarlane's red herring!

Thank you for the dismissal, but it's incomplete. After 5 years it is not just to eliminate from your finding of me the fact that I'm innocent as is Mr. Agostini of all Wrong doing allegations contained in the Wells

notice, the OIP and the Complaint as without control and without my being an officer director or shareholder of WMMA, which Luxs' testimony 7 the books prove I wasn't .

\Although senator Warren is a brilliant orator & educator I understand she had involvement with the Dodd Frank Act 7 its misuse against defendants. Which crucifies us. All the Wells defendants. It killed my wife joan !I was deprived of my constitutional rights while it took you 8 years to find my innocence of being a control person; but reserved opining on the remaining wrong doing allegations that's unjust !Just as I believe not compensating me for my efforts to bring this in house proceeding so that its constitutional and can provide justice & is critical or shut it down unless my changes are instituted or any modification that is acceptable to you. Closure is the key & the use of the plan will forever seal anyone's' objections over the in house system. '. It was my declarations that precipitated change at least compensate me for my strategic litigation in house plans' .I know that you don't have to pay me; but I ask that you do the right thing just as your predecessor's denied my whistleblower proof because they wanted to protect internal wrong doers who were criminally fixing my case & others contained in the list under EX As order.! In this manner you would also save me the additional time to litigate those SEC enterprise members & their respective john Doe1-10 & jane Doe 1-10 aiders and abettors' as i still have2 years under the Civil Rico statue of limitations! Assuming I win before I die I can prove that the civil Rico damages cost me\$1,250,000.00a year for the last 7 years=\$8,500,000.00 treble =\$25,500,000.00 without adding some of the EX A lists members. The payment tome will therefor preserve the resources.

I informed the prior commissioners et al, that I was developing the strategic plan for the in house process to be constitutionally compliant & that if you fulfill the implied agreement that resulted in my disclosing over 7 years the evolution of my strategic plan to reorganize just a small portion of the in house process ,while saving approximately 20% + of the Wells defendants' that otherwise would be eaten up for 5 years' of litigation needlessly; just because someone somewhere believes accepting the participation with me, a 48 year non recidivist felon, would stain your respective reputations'!

Come with me to commence a new beginning for the SEC as we can learn from each other how to improve our great democracy while no one can doubt the earnestness that your order ,EX A, stands for honesty, integrity & an attempt at closing a chapter that you can't be proud of & one which non of you caused..ive made many mistakes in my life; but a greater feeling comes when i see them ,correct them and admit to myself & any others' present that I didn't understand the implementation of an act or constitutional amendment would change some of the SEC employees focus of protecting the injured to abusing some of them at the same time some of the Wells defendants' that were innocent until proven guilty or in your in process system unfortunately Guilty ,until proven innocent. My observation over the last 7years of your organizations enforcement ,prosecution and investigative work product ws not only grossly negligence ;but was also someone inside who was on the take. Not necessarily a payoff; but a favor to look the other way as in my case your staff invariably looked the other way all the time!

I beleive that that guilt emanates from teams under you who at times are massaged by prosecutors they know based on trust which isnt the right way to treat those defendants in the Wells notice that the prosecution made a mistake or had an ulterior motive unbeknownst to us or was conned by the real tort feasors' to go for the red herring.

You deserve better than those mistakes as do those defendants that were sacrificed by the current process. My plan will eliminate about 80% of those negligent findings when each defendants reputation hangs in the balance .Your review of EX B1when compared to judge 'EXB2,her first 14 pages will

demonstrate to you that your own colleagues' missed the boat. Let the real tortfeasors off the hook and harmed the reputations of 3 innocent people that never did you wrong or the investors wrong. The lure of money makes honest people make justifications that don't exist to get the money they lost from someone that had nothing to do with the loss.. The elimination of due process emboldens the Commissioners' complaint initiation current system to accept their respective teams' recommendations', when it seems that there is no way to provide internal affairs that works' in this close knit family consisting of the 5 SEC divisions to which the new Commissioners are thrust into. Believe me that the 5 divisions' look at you as short term timers' who take the stress of public scrutiny when those commissioners weren't responsible for the failures in the in house process until they saw the problem and then didn't act!

..." There is a Time in every man's education, when he arrives at the conviction that envy is ignorance, that imitation is suicide, that he must take himself for better or for worse, that though the wide world is full of good no kernel of nourishing corn shall he reap; but through his own toil bestowed on that plot of ground which was given him to till. The power which resides in him is new in nature and none but he knows what he can do nor does he know until he has tried!.."

Your plot of ground is this Commission, you're mind gives you the power to till it until you overcome the problems' by using solutions' to free the innocent while punishing the guilty, to make our society a better place. I have given you additional tools, I have given you the solutions' it is now up to you to either disband your in-house adjudication or enhance it; by making it constitutionally compliant with the use of a standby federal judge to provide each of you with the meaningful judicial review before you initiate a complaint defaming a potentially innocent defendants' character and reputation you will know that you protected the innocent while protecting all of us not to be defrauded. You will also be instituting quality control and the equivalent of internal affairs that comes from the best we have which is our federal judges on stand by. Please try?'

I have attached exhibit B1 which is my commentary and review of exhibit B2 judge Brenda murrays October 16th 2019 initial decisions 1st 14 pages after you digest it together with this declarations disclosures you should have sufficient knowledge to be able to make a finding of fact just as judge GaMBREDELA did that & I now ask you to agree with her in order 1 attached at the end of this declaration after the EX A-EXC.

Mr Daspin committed no wrong doings at WMMA"

At the same time I respectfully request that you sign in order to which pays me the compensation that I notified the commissioner[s] under the last 2 administrations prior to you & you. The then sitting Presidents and their respective chief of staff and the Chief Justice of the United states Supreme court so that the equity and compensation from my labors is respected just as prior commissioners have paid consultants for over 50 years and just as those commissioners paid whistleblowers compensation exceeding \$50 million in some cases

If both orders are signed by this Commission I include in order 2 my full and complete release of any and all persons named in my case with the SEC. If order 2 is not executed then I request that this Commission within 30 days from my initial submission on the front date of this declaration file it in the case records for all to see and so that when I proceed in court going after the 2 enterprise members that worked for this SEC or retired as Judge Murray; the record will be complete even if I appeal although I don't think I

will. Ms Countryman to file this after you make up your mind whether to sign order1 &order2 ;but in no event later than 30 days from the date UPS served her effective on that UPS service date. I agree to have the filing delayed based on this Commissions sole discretion.

If this commission signs both orders &doesn't wish this motion to be placed on the record other than order1 to prove No wrong doing by me Agostini at your discretion; I will maintain its confidentiality with respect to this declaration and attachments other than order one which I respectfully request that this Commission also find Mr. Luigi Agostini completely innocent of the wrongdoing allegations' as well. Based on your finding that I had no control you know automatically eliminates Mr. Agostini as a wrongdoer. He's only 45 years of age ,the stigma still hanging over his settlement is hampering him and I need this commission's power to set the record straight by signing order one[1]. I have included his name at the bottom of the order. It is up to you to either cross out his name or leave it in with your finding of my innocence.

I thank you all for your dismissal. Its' judicially appropriate to preserve the commissions' resources and also save \$120,000,000.00 by implementing my plan EX C with this declarations' last-minute adjustments. Since legally your not bound to pay me except based on equity & the benefits that the SEC will derive which is enough for me to rely on as the ethics each of your backgrounds' demonstrates; makes me believe that I will receive fair treatment. If you don't, pay me use the plan to help our country and eliminate the stigma that the commissions' inhouse system has caused the SEC to incur.

Respectfully

  
  
E:\M\aspinPro.sqr

Commission Order 1:

7/-/2023

Based on this Commissions review of case # 3-16509:

Based on this commissions review of Case 3-16509 facts , alleged in the Wells Notice ,the OIP & the Complaints' wrong doing allegations' alleged against Mr Daspin & Mr Agostini, that neither Mr Daspin nor Mr Agostini committed any wrongdoings' at WMMA

Signed on this day----in July ,2023

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The S.E.C Commission



Based on our review of Mr. Daspin's allegation of an implied contract with the S.E.C & after review of the confidential declaration & its attachment as EX C :THE PLAN FOR THE INHOUSE PROCESS

Which the SEC herewith purchases' from Mr Daspin for \$5,00,000.00 enclosed with this order .

Mr Daspin has sold his right title & interest of the PLAN to this Commission free & clear of all liens' and/or encumbrances', & in consideration for Mr Daspin's unconditional release of all persons' & or entities named by Mr Daspin as ' enterprise members"' in Mr Daspin's declaration[s] in reference to case # 3-16509 &/or named in other submissions' to the SEC by Mr. Daspin with reference to any and all SEC employees & or retired from such employment with the SEC Select an item to read or contacting any of the persons' or entities named in the order as its ex A.in its attached list naming 23 SEC defendants dismissed by this commission.

The Commission finds good cause to compensate Mr Daspin for the 13,000 hours he used to develop the PLAN & that taking this action is appropriate to preserve the commissions resources which Daspin projects may save this commission over a potential hundred million a year after deducting all extra Commission costs to increase its adljs' staff from 5 to 10 while providing the defendants the" right to remove the reference to a federal district court'; if defendant desire[s] a jury trial before the adlj assigned the case starts' the in house adjudication process.

The Plans' implementation will provide Wells in house defendants' with, a meaningful judicial review for the Commissioners to make an informed decision of whether to grant A No Bill ,a pre complaint initiation settlement or complaint initiation.

The commission requires the consent of the President of the United States & provided that the Chief Justice of the United States' Supreme court approves permitting some of its stand by federal judges to serve as commissioner advocates' for Wells disputes to provide the Commissioners' with the facts' & preliminary opinion about any defect[s], if any, that may have been overlooked by either sides' lawyer[s]. the advocate with 2 sec law clerks will have 30 days plus up to 3 days testificandum of the lead lawyers& witness for both sides to submit a meaningful judicial review which the commissioners', at their sole option, may use to make any finding[s] with respect to issuance of a no bill or pre complaint recommended settlement by the advocate .It will be used to balance any alleged advantages that is currently alleged agasnst the systems' in house process defendants'!

The advocates review may also serve as a preliminary independent internal review of the quality of the work of the commissions' investigative and prosecutorial divisions work product & by so doing improve the quality of those divisions &/or used to weed out substandard performers by the commissioners' or its division heads! If the commission, at its sole option ,decides to use a portion or all of the plan Daspin projects' that its implementation will reduce approximately 20% of the Wells defendants' complaint initiations' & the attendant costs which are projected to save the SEC & government after deducting all incremental costs for indirect S,G &A variable,\$1,500,000.00 per defendant, plus save the defendants' deformation for 80+/- defendants' savings' assuming 400 Wells disputes in a year on average saving \$1,500,000.00 saved for each defendant that was ultimately found innocent at the end of a commissioners' appeal which saves \$120,000,000.00 per year projected.

Daspin has agreed to use MKMA a 50 year old consulting services corporation to serve as the as the ombudsmen.

We find that taking this action is appropriate to preserve this commissions resources' as well as provide the commission a huge potential cost savings with a solution to some of the negative allegations associated with the implementation of the Dodds Frank Acts' mandate.

If implemented the Plans recommendation is that the In House adljs' are the exclusive jurisdiction for the SEC complaints' disputes' unless a "remove the reference to federal district court motion" is made if the defendant wants a jury trial. If a guilty verdict in house is adjudicated the first and only right of appeal is with the federal district court ,to eliminate the alleged conflict of interest alleged by the defendant for the commissioners' having the first right to appeal the complaint that the commissioners initiated. Complaints will be assigned by the chief administrative judges by lottery to the adljs as no delegation of cases to adljs' can be continued as its practice will compromise the independence of the adlj as a delegate is an agent, representative & a fiduciary of the delegator ie; the commission is the delegator & as such influences its delegate to adopt the complaints wrong doing allegations alleged to have been committed by the defendant.

Mr Daspin agrees to keep this transaction confidential unless the SEC provides Mr Daspin it's written consent to disclose this transaction

.If this is not approved & signed by this commission the understanding is that the commission will cause its Secretary to file it with the effective date of 6/29/23 so that it will be a part of the entire record.

I asked the Secretary to hold filing it as an accommodation to this commission so that if the commission signs it ,it can remain confidential if the commissions desires.

By my signature below releases the above enterprise members etc only if the commission countersigns this order 2& remits it to me with a check in the above amount within 30 days from 6/29/23.

If the commissioners', at their sole option, do not sign this order 2 or one providing me with the above compensation that may include such additional warrantees that I may have inadvertently missed, within 30 days from 6/29/23 ,my release is void &of no effect. Then the commissioners will direct their Secretary, Ms Countryman Esq ,to file the motion & EX A to EX C plus both orders' # 1 # 2; if order 2 is not signed by the commissioners & remitted to me no later than 7/29/23, so that I will be in compliance with the filing time from the time I received this commissions' dismissal of my case.

If within 30 days & by 7/29/23 I receive order2 & the compensation, I will be bound to all order 2 terms, but order one [1] must be disclosed as part of the record to reduce the deformation we are suffering whether or not order 2 is signed.

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By the COMMISSION on this--- day of July,2023!

By E.M Daspin Pro SEC I hereby release the above referenced SEC Employees & all enterprise members as contained in my prior ' providing the Commission execute this order with the enclosed compensation which is paid to me at my home address no later than 7/29/23 else my release is null and void & this commission will insure this motion with its enclosures are filed as of the effective date of 6/29/23, if order #2 & the compensation is not received by me by 7/29/23!

By E.M Daspin Pro SEC

[date 6/29/23]