Edward M. Daspin Case # 3-16509 August 21, 2023

[redacted]

Dear [redacted]

Please consider this motion for reconsideration as if attached to my FINAL ADDENDUM MOTION FOR RECONSIDERATION!

I HAVE FOUND NEW FACTS THAT THE COMMISSION AND ITS THEN COMMISSIONERS and with the Chairman [redacted] and the 2 other chairmen before [redacted], and Ms. [redacted] with respect to the inhouse Dodd Frank process and with the co-conspiracy of the then Commissioners, their respective enforcement director and asistant Director Enterprise members and with the Enforcement Division's McGrath/O'Conell Enterprise members and with the Murray/Grimes Enterprise members with the McGrath Enterprise, and the MacFarlane Newco Enterprise members collectively violated by co- conspiracy to defraud me and concoct a fable alleged by the commissions' enterprises inhouse judges and framed me as a guilty securities fraud wrongdoer. The commission committed of a series of predicate acts against me including subornation of the investor operators perjury, who with malice of forethought while knowing the falsity suborned their perjury to allege [redacted] t about several weeks earlier the SEC Enforcement Division thru its New York regional offices informed [redacted] that she was a whistleblower and would be paid a percentage of any judgments gained against me thru an SEC proposed security violations lawsuit. [redacted]

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

I had filed an OSC for a TRO the day before the SEC served me with its threatened complaint informing my lawyers that if the SEC selected their house process, I requested of Federal District New York Judge Bachman that the sole jurisdiction to be in the Federal District Court, because of my medical illnesses and that I couldn't take the stress of a maximum 12 month trial. I had been hospitalized 6 times in the 12 prior months from the TRO filing!! In the TRO's footnote I also informed Judge [redacted] that if she denied my motion I would lose my Constitutional right to a jury trial.

The Enforcement Divisions, the Commissioner's Chief Counsel as well as the Commissioners collectively knew that at the time they filed the inhouse complaint that all the inhouse judges were Constitutional violators of the Appointment Clause and as a

result any legal costs by this defendant would be stolen from me as they knew that the Constitution voids any judgments made by non-Article 2 of the 2nd Amendments' appointment clause!

The McGrath Enterprise members, aided by Judge [redacted], defrauded Judge [redacted] by their omission of that material fact and they used Dodd Frank's first right of jurisdiction to the SEC to defraud Judge [redacted] and me by pointing to that first right without disclosing that Dodd Frank didn't give the SEC that right if it's inhouse judges were Appointment Clause violators!

McGrath aided by Judge [redacted] information to him to inform Judge [redacted] that if Judge [redacted] dismissed my TRO, Judge [redacted] had selected an inhouse judge AND MY CASE WOULD BE OVER IN ONE YEAR SINCE THE PROSECUTION INFORMED THE COURT IT WAS PREPARED TO SUBMIT THE SEC COMPLAINT against me that afternoon!

Judge [redacted] delegated Judge [redacted] to hear my case and that judge found as fact that Imr failed all7 factors that federal judges use for adjournment motions. In addition, Judge [redacted] found as fact:

> "...that if anyone forced [redacted] testify he will be irreparably harmed..."

About 30 days after Judge [redacted] Postponement Sine D, Judge [redacted] for no reason stated switched judges in my case after the prosecution failed to appeal Judge [redacted] findings of fact and protective order in a timely manner. Judge [redacted] initially stated that the current orders in my case will continue, but after 2 weeks, all of a sudden he dissolved my protective order while admitting that he read it and knew I would be irreparably harmed if he dissolved it, but ordered me to testify in120 days which his dissolution order also ordered! Judge [redacted]' reason was that "...I didn't like the OIP allegations of wrongdoing against Mr. Daspin...". Then after I objected, as those allegations hadn't yet been adjudicated, he reason then used rule 300, which disfavored adjournments despite the fact that Judge [redacted] had already taken that rule into consideration before she signed the protective order, [redacted] I motioned Judge [redacted] to reverse Judge [redacted]' dissolution and she not only denied it, but on the interum my law firm disgussed with Judge [redacted] violation of my civil rights violation of my protective order and playing musical judge chairs. They also motioned to be dismissed from my case since they had used up my litigation fund of $1 million. I fought it as both New York and NJ laws demonstrated that despite a client running out of money for defense, if the hearing was eminent the law firm couldn't be dismissed! My law firm had learned the entire case using 3 lawyers at$350/hour, so they were prepaid to defend me. Judge [redacted] dismissed my law firm forcing me to be a pro se.

At the time I did not know of the 10 day reconsideration motion rule, when the federal rules of civil procedure permit 30 days. In this matter, I received this Commission's dismissal of

proceedings dated June 2,2023 on June10/2023 and my first reconsideration motion was filed on June29, 2023.

Since I received no answer I added a supplemental motion for reconsideration, the However in my inhouse case this commission permitted with malice of forethought me to be found guilty of securities fraud based on a concocted wrongdoing Wells Notice, OIP,and Complaint that knowingly alleged that I committed wrongdoings after a RES Adjudicata by a Federal bankruptcy judge in the 2014 WMMA Chapter 11.

[redacted]

[redacted] My motion to Judge [redacted] to reverse the [redacted]' default was also in vain. So, it took the Supreme Court Justices' order in Lucia v. SEC voiding mine and 149 other in house adjudicated defendants' guilt findings based on all the inhouse ALJs violations of the Appointment Clause. The cases were allowed to be reheard, but the Justices forbade any judge that participated in the pre-Lucia judgment hearing to hear the 2nd hearing if the defendant objected. I motioned Judge [redacted] to recuse herself as she orchestrated and initiated the default judgment and I also informed her that she had a monetary reason to find me guilty in the 2nd hearing to no avail. She went into contempt of the Justices' [redacted] order violating the United States Supreme Court.

How many violations of bill of rights must I encounter in the face of Res Adjudicates. Because of the frivolous wrongdoing allegations made with reckless disregard for my litigants rights, Judge [redacted]'s finding me guilty of being a control person when the 12/2012 WMMA subpoenaed documents and 7 board resolutions proved I was only a consultant for MKMA that had a 5 year WMMA board approved consulting service contract with WMMA with no power for MKMA to bind WMMA and/or its personnel. While the SEC claimed that I milked $1 million in fees from a startup, while financials submitted to the SEC and its own fraud analyst stated that I, CBI, and MKMA collectively only received $240,000 in fees.The books also proved that CBI and MKMA collectively capitalized WMMA with $4,460,000.

Despite the SEC's negative spin using my 4 decade old felony in which I spent 6months in federal prison, the SEC had to admit that prior to any investors investing in WMMA, I voluntarily disclosed my felony and prison term on my Website, daspinandco.com up since2006 till now where I disclosed my felony and 6months prison term disproving that I waited until the 11th hour prior to an investor's investment to dislose my felony!!!. Despite the foregoing denial of my right to a fair trial and violations of 4 of my bill of rights, I still want to keep the SEC crimes against mean for this Commission to either sign order #8

or settle while keeping this motion confidential. If you do not agree to an extension by 8/24/23 then I will seek an OSC for a TRO from a Circuit Court as unless I hear by the extension I ask for the case is marked dismissed, but I believe what the SEC and its Enerprise Divisions and their respective members perpetrated against me should be heard as the reasons for my late filing is:

1) The SEC defrauded me and Judge [redacted] to violate my right to a Federal District Court thereby causing the theft of my million dollar litigation fund.

2) My age and my illness as Judge [redacted] protective order found caused me to need an extended period of time as my first motion for reconsideration was filed 19 days after I received the Dissmissal of the proceedings dated june2, but which I received on June10, 2023.Therfore, I was 9 days late with my initial reconsideration motion because I was also forced to be a prose, because of the [redacted] ALJs disregard and violation of my protective order, dismissal of my law firm while I was hospitalized and then I sustained a default judgment. Then Judge [redacted] violated the Res Adjudicata of Federal Bankruptcy Judge [redacted] who found I committed no wrongdoing at WMMA 5 years earlier. Judge [redacted] found I committed scienter when she used the evidence of what she knew were perjured investors' testimony. At the same time another case had been dismissed with prejudice when [redacted] sued WMMA, me, and Agostini for securities fraud.

3) The SEC has stamped the WMMA PPMs as exempt securities, so in reality the SEC had no jurisdiction in the WMMA case at all.

The SEC violated my Constitutional rightsand denied me a fair trial and as a parting gift didn't have the decency to find Icommitted no wrong doing at WMMA.
If this Commission doesn't grant me my extension request as of 8/23/2023, I will call your Secretary on 8/23/2023 to find if the extension is granted and if not, or I find my case on the dismissal is still of record on that date, I'll ask for the relief I asked this Commission to give me elsewhere based on an OSC for TRO for this Commission to Commission to show cause why they shouldn't pay me for the damages attributable to the violations of some of my Constitutional Amendment rights and denying me a fair trial.

Respectfully,

[redacted]

Edward M. Daspin

[redacted] pro se

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OS Received 08/21/2023

Edward M. Daspin Case 3-16509 August 17, 2023

Final Addendum of motion for reconsideration. Using the inductive method of reasoning I finally came to the realization that it was not only the SEC Enterprises member(s) that damaged me; but more inclusively it was Commissioners and the Securities and Exchange Commission that violated my civil rights and the facts herein and below also enclosed all of the aforementioned denied me a fair trial.

Dear [redacted]

I declare under laws of the United States that the foregoing declaration and request for you to open the file in my case is true to the best of my knowledge. I know if I willfully misrepresent, I am subject to punishment.

I herewith attach settlement Order #8 to give the Commissioners who share in the guilt of denial of my bill of rights and a fair trial by ignoring the submissions I sent to the Commissioners from 2016 until today advising them and the President and his Chief of Staff about the violations to my bill of rights and with none of the Commissioner bodies taking corrective action in the interim.

I ask this Commission for $29.5 million in damages, including the three permitted damages: compensatory, punitive, and nominal as described herein and below or the case is settled not later than 8/23/2023. If the Commission elects to settle this matter, I will settle, or sign Exhibit B Order #8 and at that time sign a gag order which releases for all the Commission members and their respective witnesses in a form acceptable to the Commission.

It is in the Commission's financial interest to settle this matter. If the Commissioners do not settle or sign Order #8 in the time required, then I herewith once again ask the Commissioners to sign Order #5 (Exhibit B attached) and direct [redacted] to supply me with the disc(s) on this case no later than 8/24/2023.

The disc(s) should include all documents WMMA sent to the SEC. They should Include all cases including the WMMA Chapter 11. Also include the [redacted] v. SEC Daspin matter and all depositions of the investor operators. Also include all non-disclosures WMMA signed with its prospective employees and their respective employment contracts. Also include all WMMA/WDI PPMs as well as the Wells Notice and Wells Reply. Also include the transcripts before Judge [redacted] of the first pre-Lucia hearing, as well as the submissions Judge [redacted] and her protective order and all the motions before Judge [redacted] and Judge [redacted]. It should also include as my motions to recuse Judge [redacted] and the transcript of Judge [redacted]s proceeding post-Lucia and each and every submission I made to the Commissioners during those proceedings. It should also include [redacted] declaration to Judge [redacted] regarding my ill health and the fact that he declared: '…if anyone forced me to testify, I might die…". Also

include the Brady disclosure document and all the exhibits that Judge [redacted] refused to accept in her 2019 hearing.

[redacted]: "...if anyone forces Mr. Daspin to testify, he will be [redacted] That was the law of the case and the [redacted] / [redacted], Enforcement, and the Commissioners' collective Enterprise members violated the law of the case right up to today. For this reason alone, my case should not be part of a mass dismissal proceeding and must be treated individually. The facts in this case will show my bill of rights and this Commissioners' denial of giving me a fair trial, as the Commissioners had found me guilty and initiated a complaint against me and then delegated that complaint to an inhouse ALJ, who was an inferior judge and by law had no right to judge me as clearly described in Exhibit E, the SEC v. Jaresky Supreme Court case. (See Exhibit E page 1/7 in the 2nd para. It states:

> "...Dodd Frank's broad grant of unfettered discretion to the SEC to choose between enforcing identical claims in either federal district court or its own administrative tribunal violated the Nondelegation Doctrine because (a) the assignment of claims to a non-Article III tribunal is an Article 1 power, and (b) Congress provided-as the SEC conceded-no intelligible principle to the SEC. Third, the two layers of for-cause removal protections of ALJs violated Article IIs Take Care Clause..."

Judicial notice is pointed out that the SEC conceded that it had no intelligible principle to guide it as to which jurisdiction and which type case they should submit to the inhouse. On page 3/7(.2) it discusses Heckler v. Cheney which the SEC counsel's admitted that it proved that the SEC had no intelligible principle and further that the prosecution had no discretion to choose either jurisdiction because there is no precedent (see [redacted] (May 2015) stating "enforcement discretion at the SEC". The Heckler case was reviewed in 1985). The Commission's inhouse Dodd Frank violating defendants' civil rights and denying defendants of a fair trial subsequent to 1985 demonstrates that the Supreme Court would change Heckler providing the Commissioners the right to abandon the violations of the bill of rights against defendants. See Exhibit F, which proves that the Commissioners are responsible for the damages that their inhouse judges, enforcement and prosecutors inflicted against me by the Commissioners delegation and/or assignment of my case that the Commissioners created by initiating the complaint against me. I believe are circumstances that the Supreme Court would not let this Commission get away with and which Heckler, a 1985 Federal Court decision, was not intended to be used to provide the Government agencies to defraud innocent defendants by denying their bill of rights and a fair trial.

For the above reasons my case demonstrates why the inhouse proceedings and Dodd Frank must be stopped now or replaced by my plan, which is Exhibit C attached to my first motion and declaration for reconsideration and as the plan was amended in the remaining 3

declarations and support of the motions for reconsideration. Besides the fact that in 2014 (see Exhibit E pg 2/7 para 2) and a Bankruptcy Federal Judge in the WMMA Chapter 11 found as fact:

"…Mr. Daspin committed no wrongdoing at WMMA…"

The above proves and further reinforces the fact that this Commission permitted me to be crucified when 2 years before Judge [redacted] and [redacted] found me guilty of a default judgment they violated the above Res Adjudicata by the bankruptcy court. By the fact that the Commissioners under [redacted] initiated a complaint alleging [redacted] as disclosed in this declaration for reconsideration and the prior 3 declarations. [redacted]

I had also requested in my supplemental reconsideration declaration that the Commission sign Order #4 (a part of Exhibit B) to provide me the right to sue some of the Enterprise members that worked for this Commission during the time I was a defendant as they collectively committed more than 2 predicate acts required for a Civil Rico case within a period of 8 years and which also now will include the Commissioners that were made aware of their division members' wrongdoings against me and not only took no action to protect me from the crucifiicion, but by taking no action proved that the Commissioners' inaction proved the malice of a forethought and the reckless disregard for my civil rights and the denial of a fair trial; but all of you Commissioners instead from 2015 until now became a cheering section disregarding the injustice I was suffering and instead boasting about the amount of penalties the Division of Enforcement accumulated in 2022. Believe me, the Supreme Court will not be your cheering section, when they hear of your wanton disregard for my civil rights and your denial of a fair trial in my case. Those facts are also the reason I believe the Commissioners used dilatory tactics to hold up the adjudication of my appeal for 3 years and 10 months; knowing the statute of limitations is 4 years. As Exhibit A demonstrates and Judge [redacted]'s protective order shows that this Commission forced me by its Grimes Enterprise members to be a pro se. As Exhibit A demonstrates I am still ill and don't have the time to file a lawsuit against the Commissioner and the Government until [redacted] in Order #5, the disc(s). I ask this Commission to give me a wide berth with respect to its rules as I am not a lawyer and the court requires specificity to each statement of facts of this Commission members wrongdoings in the case I will file against the Commission and Commissioners for violating my civil rights and denying me a fair trial unless your sign Order #8 by 8/23/2023 or settle before that dat.

If the above is not completed by 8/23/2023 (Order # 5 Exhibit B), I request this Commission to sign Order #5 to direct [redacted] to send to me that order. n extension of the statute of limitations for 6 additional months beyond 4 years as in Order #4 (if it can't give me relief by law, then advise me immediately and I will ask for that relief to the Fifth Circuit Court or be forced to add in the Commissioners' denial of a fair trial that the District Court permit me to add the treble in damages against the Commissioners whose dilatory tactics caused me to lose

the Civil Rico suit portion of my complaint against the current Commissioners). In retrospect, it is obvious that the Enforcement Division Director and the Commissioners' General Counsel with the Commissioners purposely trying to trick me by obstructing my justice which delayed my statute of limitations which I could have filed the Civil Rico lawsuit 60 days after I filed my appeal with this Commission. The predicate acts which the McGrath Enterprise members and which includes the WMMA/WDI Enterprise Members and the MacFarlane Newco Enterprise members all aided and abetted by the Murray/Grimes Enterprise members [redacted]

I also enclose as Order #4 and #5 in Exhibit B (which includes Orders #1 to #8). In those orders I asked the Commission to provide me the right to find the facts which facts I submitted in December 2012 consisting of 10,000 pages of documents to the Commission. Several selected documents i.e. the 8/29/2013 Lux deposition specifically includes the 1/20/2011 CBI/Daspin sale of its 5 year consulting service contract to MKMA making Daspin and CBI exclusive subcontractor consultants for MKMA, while barring CBI and/or Daspin from providing such consulting services in the mixed martial arts industry to any individual and/or company except through MKMA, which the contract bars MKMA from providing MMA services to anyone else. In Lux's 8/29/2013 deposition he testifies that Daspin was only a consultant and not a WMMA officer, director, or shareholder. The WMMA bylaws only give control to the WMMA shareholders and the directors they appoint. In addition, the WMMA Chapter 11 proves, which is in my Wells Reply Exhibit A, the 6/19/2012 Dishonest Shareholders's Meeting, is that early as that date, page 17, was suborning the investors' perjury to perjure in essence that "Daspin controlled everything at WMMA" and Judge [redacted]s Res Adjudicata discussed in my Wells Reply, Exhibit A, that: "Daspin committed no wrongdoing at WMMA". This was 2 years before the Commissioners, including [redacted], initiated the wrongdoing complaints against me.

If you do not accept the fact that my case should have been dismissed after Judge [redacted]s protective order was signed in early 2016, instead of permitting Judge [redacted] to violate it, and to play musical judge chairs and to switch the case to Judge [redacted] and to permit Judge [redacted] to dissolve the protective order, then your complete disregard proves that you directly share in the guilt of denying me a fair trial.

This case proves that the prosecutors, the judges, the prior Commissioners and the Enforcement Division leaders used every trick in the book to deny me a fair trial to run me out of the money and [redacted]. The violations of this case were not meant to be dismissed for no reason.

If you cannot extend the statute of limitations and if the Fifth Circuit cannot extend them for the delays attributable to the Commissioners' dilatory tactics which violated my statute of limitations to file a Civil Rico, then I will add to my complaint for violation of my not receiving a fair trial, and for violation of my bill of rights, requesting that the current Commissioners, the

Director and the Assistant Director of the Enforcement Division, the Commission's General Counsel, the prosecutors, and the Murray Enterprise to be personally held responsible for the amount of damages I would have received for the Civil Rico violations. All of you collectively obstructed my justice and with malice of forethought and reckless disregard of my civil rights all of you are responsible for my loss of treble damages against this Commission's Civil Rico Enterprise Members to which I shall add you Commissioners as the Commissioners will be the lead defendants.

I had apologized in my motions for reconsideration which I now retract because I had misread the order dismissing the proceedings thinking that the Commission dismissed me and the others for "not being control persons". In fact, I prematurely thanked the Commission for finally admitting the truth that I was not a "control person". Upon rereading the dismissal, it is apparent that as part of the SEC's scheme to deny me a fair trial and deny me my bill of rights the Commissioners chose to hide behind the case law Heckler, Et Al v. SEC. Heckler was a 1985 case. He had already been found guilty as a criminal defendant and was in jail making the SEC's civil complaint redundant because the civil complaint's restrictions would have been while he was still in prison. You gave Heckler ice in the wintertime by dismissing a portion of the SEC complaints' allegations. The 1985 case was before any Dodd Frank Act before presumption of guilt; before any denial of a jury; before judges violated the Appointment Clause inhouse, etc.

I believe just as Roe v. Wade was changed, that the Supreme Court would have changed Heckler. The other cases you recited in the order dismissing proceeding were all based on remands from the Fifth Circuit Court and my case is not a remand and is completely differentiated from the facts recited as in those cases the Commission was forced to dismiss portions of their security violations proceeding.

HISTORY AND RECITATION OF SOME FACTS TO ENABLE THIS COMMISSION TO PROVIDE ME WITH JUSTICE

(I am giving you as an example sufficient facts for you to have adjudicated me innocent if all the disingenuous wrongdoing allegations in the Wells Notice, OIP, and Complaint).

The SEC started its case in 2012 when the Investigative Division and the SEC's New York Region Directors, including [redacted], chose [redacted] as their whistleblower and after that [redacted] and [redacted] confirmed her as their whistleblower. [redacted] suborned the perjury of the other WMMA investor operators on 6/19/2012 in the dishonest shareholders' meeting werein she alleged:

> "…say Ed controlled all small and large things at WMMA…don't say Ed controlled the Board of Directors, because he denied that in writing to us…and I will be the first person to sign it…"

The first declarations I submitted to the then Commissioners with copies to the President, his

Chief of staff, and the Chief Justice of the Supreme Court proved that: the McGrath SEC prosecutors aided by Judge [redacted] defrauded Federal District New York City Judge [redacted] by omission of the material facts that all the SEC judges were all Appointment Clause violators of the Constitution. In the footnotes of my OSC for a TRO to Judge [redacted] I included that I would be denied a jury trial unless she ordered the Commission to sue me only in Federal District Court and not inhouse. [redacted] aided and abetted by Jud.ge [redacted] disclosed to Judge Bachman that Dodd Frank gave the Commission the first right of jurisdiction for either inhouse or Federal District Court. However, Judge [redacted] and [redacted] and the Enforcement Division from the 2014 Jaresky Federal District Court case (recited in Exhibit E, pg 2/7 (.)2) that the Dodd Frank practice inhouse violated those Constitutional elements. As even a simpleton would know that if the Constitution mandates that an inhouse judge must comply with the Appointment Clause and that any proceeding that had a common law complaint requires a jury trial benefit, the violations by the Commission with malice of forethought, knowingly violated my Constitutional rights which violations were omitted by [redacted] as aided by Judge [redacted] as [redacted] also concealed that Judge [redacted] was not Constitutionally appointed either. SEC lawyers, inhouse administrative judges, Commissioners, and certainly the Director and Assistant Director of the Enforcement Division are supposed to know the Constitution at heart, yet they clear cut violated it.

I also submitted additional declarations during the [redacted] and [redacted] proceedings and up to the [redacted] post Lucia proceedings that proved that the SEC's Judges [redacted] in the pre-Lucia hearing and [redacted] in the post-Lucia hearing violated Judge Foelak's protective order 3 times and forced me to testify when Judge [redacted] Postponement sine di order stated as fact that

> "...Mr. Daspin would be irreparably harmed if anyone forced him to testify...".

I also disclosed to the then Commissioners in 2016 that Judge [redacted] ordered a default judgment against me when the [redacted] knew that I was hospitalized and could not attend the hearing. In fact, Jarseky v. SEC's 2014 Federal District Court case proved that Congress violated the Constitution by providing in Dodd Frank that the SEC had a right to legislative powers by granting the SEC to have first jurisdiction in either the inhouse process, or in Federal District Court.

[redacted]. A Federal District Court case in Texas at that time held Pfizer responsible for issuing Lyrica to its Gabapentin patients and [redacted]. Pfizer's gross annual sales from Lyrica were $250 billion making the Texas plaintiff's $2.5 billion lawsuit a drop in the bucket and to this day Pfizer still makes and sells Lyrica. Not only did the judges know that a week before I

[redacted]

In August 2018, the Supreme Court in Lucia v. SEC ordered that none of the inhouse judges had been Constitutionally appointed, and the Justice's voided 150 judgments against inhouse defendants and gave the Commission the right to sue the 150 defendants after the inhouse judges complied with the provisions of the Constitution. In that order, the Justice's ordered that no judge that had participated in the pre-Lucia hearing could conduct the post-Lucia replacement hearing if the defendant objected to that judge hearing the second case. Then Judge [redacted] refused to recuse herself on my motion, which not only informed her that she was an initiator and orchestrator of my default judgment by her violation of Judge Foelak's protective order and by her playing musical judge chairs switching my case from Foelak to Judge [redacted] for no reason, but she also had a personal monetary interest in finding me guilty. My reason described for her monetary interest was that in 2016 I disclosed to her, Judge [redacted] and the prosecutors that after this case was over, I would sue all of them for Civil Rico violations.

As this Commission should know a judge is not permitted to hear a case in which they have a monetary interest, unless they are Justices of the Supreme Court that have an exemption to that rule. In my disclosure to Judge [redacted] that her contempt of the Justice's [redacted] order refusing to recuse herself on my motion, I made it clear that she could use her guilt finding against me to set up a sour grapes defense, as I had already informed when I sued her for the Civil Rico damages, she could allege that she found me guilty violating the Justice's order.

I repeatedly advised the Commissioners of the aforementioned facts, and each time I did so I copied the President and his Chief of Staff. Despite these Constitutional violations of my civil rights the Commissioners denying me to receive a fair trial, as despite those facts the Commissioners took no action to protect me from Judge [redacted], the prosecutors, and Judge [redacted]

I disclosed to the Commissioners the fact that former Judge [redacted] in a 2015 Wall Street Journal editorial had declared that Judge [redacted] pressured her to find more cases for the prosecution. When Presiding Judge [redacted] was asked to submit an affidavit to the WSJ to contravene Judge [redacted] yet Judge [redacted] refused to do so and sent a note instead stating he would never submit an affidavit in that matter!

Instead of Commissioner [redacted] extricating Judge [redacted] despite the 2 layer for cause removal violation of the Constitution, Commissioner [redacted] could have put her on the sidelines with full pay. Instead, the Commissioners it appears aided by Senator [redacted] used the Inspector General to issue a report alleging he could not find sufficient proof against Judge [redacted] In fact, Judge [redacted] WSJ declarations proved the allegations against Judge [redacted] were for her criminal conduct and the complaint should have gone to the Attorney General and not to the Inspector General.

The reticence of Commissioners under [redacted] to protect innocent defendants by permitting Chief Judge [redacted] to continue on infecting the inhouse process while Chair [redacted] in 2015 lied when he stated "… the prosecution only has a slight edge against defendants…". While Chair Commissioner [redacted] boasts about the $4 billion in penalties in 2022 without disclosing that a lot of those penalties came from the Enforcement Division fixing cases by the inhouse judges against defendants proves to this defendant that the entire SEC 4,500 Commission employees are a club that has made a decision with malic of forethought that they don't care about how many cases are fixed against innocent defendants, but how much money they can collect from the violators of SEC laws and innocent defendants. The Commission and all employees are all together as a club Commissioner [redacted] admits he talks to prior Commissioners all the time. That ex parte conduct with Commissioner [redacted] with Commissioner knowing she would be one of the defendants in my Civil Rico lawsuit along with Judge [redacted] and Judge [redacted] is another reason he may have protracted my case's adjudication and tried to deny me justice by putting my case in with 41 others using a 1985 case to violate my civil rights and denial of a fair trial.

Judge [redacted] refusal to contravene Judge [redacted] statements to the WSJ confirmed that if Commissioner [redacted] had delegated to the judges inhouse her complaint against me when had she performed her duties WHICH REQUIRES EACH COMMISSIONER TO ENFORCE SECURITIES VIOLATIONS FROM ANY ALLEGED PARTICIPANTS! ALL OF HER [redacted] AND [redacted] DOES COMMISSIONERS SUBCONTRACTED THEIR ENFORCEMENT AGAINST ME WHILE EACH OF THEM ARE DIRECTLY RESPONSIBLE FOR THE DAMAGES I INCURRED BY THEIR SUBORDINATES. SHE KNEW NONE OF HER INHOUSE JUDGES WERE CONSTITUTIONALLY APPOINTED AS DID THE COMMISSIONERS BEFORE, YET WITH MALICE OF FORETHOUGHT AND RECKLESS DISREGARD FOR THE LAW IT TOOK THE SUPREME COURT IN LUCIA TO CORRECT THE CONSTITUTIONAL VIOLATION. THOSE COMMISSIONERS MADE OUR FEDERAL RULES OF CIVIL PROCEDURE AND OUR CONSTITUTIONAL BILL OF RIGHTS LOOK RIDICULOUS BY IGNORING THE DECLARATIONS I SENT TO THE COMMISSIONERS. Commissioner [redacted] should have sent the matter to the proper jurisdiction, the AG could have given immunity to Judge [redacted] and it is obvious that he would have testified that Judge [redacted] had pressured other judges to fix cases against defendants. The statistics proved that it was more than a coincidence that over the 3-year period ending 3/2015 the inhouse judges found 90% of the defendants guilty, while during the same period with the same approximate number of cases the Federal District Court Judges in SEC cases found 32% of the defendants were innocent.

Yet the [redacted] and her Commissioners still stuck me with Judge [redacted] and Judge [redacted] new Pratt Boy who had the unmitigated gall to dissolve my protective order exposing my life to possible death. In 2019 Commissioner [redacted] and the [redacted] and and John Commissioners permitted Judge [redacted] to find me guilty, when the facts and the prosecution fixed the case against me as the facts prove I was an innocent defendant. Judge [redacted] conduct in my case proved that she was fixing it against me. Judge [redacted] switched judges from Judge [redacted] to Judge [redacted] for no reason! This was after Judge [redacted] postponed my case with a protective order and after she found as fact: "…if anyone forces Mr. Daspin to

testify, he will be irreparably harmed…". It is obvious it what was the sole reason for switching judges, because 3 weeks after Judge [redacted] got my case, he violated the law of the case using a sham reason that Rule 300 disfavored adjournments. [redacted]. Judge [redacted] dissolved the protective order and forced me to testify in 120 days. In addition, my law firm was so upset by the musical judge chairs that Judge [redacted] played, that they motioned and were to be allowed to be dismissed because they also had depleted my $1 million litigation bond. The SEC rules in that regard violate New York and New Jersey's case law which clearly holds in law firms if the defendants run out of money shortly before the trial is supposed to commence.

Judge [redacted] finding of fact proved that I failed all 7 factors which Federal Judges use to find adjournments. Despite her findings, and the fact that I would be irreparably harmed, it is obvious the [redacted] duo not only violated my Constitutional rights to a fair trial by violating a protective order and forcing me to testify, but they also forced me to be a pro se.

The stress associated with forcing me to defend myself, compounded by the fact that Commission's filing of a disingenuous complaint against me knowing I had 3 Res Adjudicates by 3 separate Federal Judges which collectively proved that "…I committed no wrongdoing…" and "…that I did not fraudulently induce [redacted] violating securities fraud…" which the Federal Judge dismissed the complaint against me with prejudice, and lastly that the WMMA contract which [redacted] declared in his [redacted] recantation in which he attached his OIP answers that he used the Chamco service contract as a template for the WMMA service contract and that "…Daspin did not write the WMMA service contract…" and [redacted] proved that in my Wells Reply, Exhibit C, Federal Judge [redacted] found me "by using the Chamco service contract …" which he found me completely innocent "…of any securities violations…" on 12/31/2012, a Res Adjudicata barring Judge [redacted] from finding me guilty of violating the Exchange Act.

[redacted]

Who would believe the Government of the United States and the Commissioners then and now would concoct a phony disingenuous securities cases against innocent defendants including me knowingly, recklessly, and with malice of forethought particularly when a Federal Bankruptcy Judge found in WMMA's 2014 Chapter 11: "…that Daspin committed no wrongdoings…" (that finding eradicates Judge Murray's allegation that I violated scienter)

The prior Commissioners supervising my case permitted the McGrath O'Connell prosecutors with the Commissioners initiated a complaint when the prima face evidence disproved the wrongdoing allegations. The judges and SEC prosecutors' conduct unchecked by the

Commissioners, who violated my rights to a fair trial and my civil rights under the bill of rights of the Constitution.

As if that was not enough violations of my civil rights, when you review Judge [redacted] October 16, 2019 initial decision which is in my appeal as Exhibit B1, I disproved each allegation in the first 14 pages of Judge [redacted]'s opinion (B1 took me 29 pages, but if I contravened Judge [redacted] remaining 36, it would take me another 100 pages, which the SEC rules don't permit). In Judge [redacted] opinion you will see that she used the testimony of proven investor operator perjurers as her evidence when the SEC prosecutors admitted that [redacted], and [redacted] perjured their respective subscription agreements that they were accredited investors and when my 2 Reply declarations in WMMA's Chapter 11, my exhibits proved Main, [redacted] were perjurers as well. In addition, in the Chapter 11 that non-investor MacFarlane, who was WMMA's President from 2/17/2012 to 8/10/2012, denied that he was ever WMMA's President. My Reply declaration attached 2 exhibits with contracts with In Demand and Bell Canada where he signed them as WMMA's President.

> THE COMMISSIONERS USED THE ALJS AS THEIR RESPECTIVE AGENTS AND REPRESENTATIVES MAKING THE COMMISSIONERS LIABLE FOR THE DAMAGES I INCURRED AS A RESULT OF THE RESPECTIVE VIOLATIONS OF MY CIVIL RIGHTS AND DENIAL OF A FAIR TRIAL, BECAUSE I SPECIFICALLY COPIED THE COMMISSIONERS AND THE PRESIDENT AND CHIEF OF STAFF WITH THE MURRAY/GRIMES DENIAL OF MY CIVIL RIGHTS WITH THE PROSECUTORS DENIAL OF MY CIVIL RIGHTS AND WITH MY RECEIVING NO FAIR TRIAL.

Judge [redacted] not only disregarded the 3 Res Adjudicates issued by the 3 Federal Judges before the Complaint and Wells Notice were filed against me!! Judge [redacted] in her initial decision knew by her admission that she read my Wells Replies Exhibit A, the Dishonest Shareholders Meeting Page 17 that the SEC whistleblower, Ms. [redacted], who in 6/19/2012 suborned the perjury of all WMMA investors to fabricate I was a control person. Judge [redacted] abused her discretion by using the investor operator's testimony, violated Judge [redacted]s protective order, violated the Justice's [redacted] order, violated my recusal motion, by using the investor operators' testimony in her initial decision. Judge [redacted] disregarded the prima face evidence, the facts contained in the 15,000 pages of documents submitted in this case, and the 3 res adjudicates from Federal judges. All the aforementioned facts proved I committed no wrongdoing at WMMA.

Now this Commission comes to me hiding behind Heckler v. Chancy when Heckler v. Chancy has no bearing denying me a fair trial other than that this Commission refuses to admit its violation of my civil rights and refuses to admit it and its staff denied me a fair trial. In Heckler the court made a 1985 decision long before the Commission's use of Dodd Frank Act and who violated defendants' right to a jury trial after 1985 the Commission's use of inhouse who were the Commission's agents and delegates making the judges fiduciaries for the Complaint initiators made that 1985 case law obsolete with respect to the Commission's subsequent violation of my civil rights. The 1985 case law was made before the Commission permitted its judges to violate

the Appointment Clause for 8 years before the Supreme Court stepped in and violations of this and other defendants' civil rights; violations of not receiving a fair trial; violation of the Supreme Court Lucia prohibition that if a judge participated in the pre-Lucia adjudication and if the defendant objected, that judge could not hear the second hearing.

The indiscretions of the Commission before 1985 do not have any comparison to the gross commission injustice perpetrated against me and other innocent defendants after Dodd Frank in 2011. I believe the Supreme Court would take a different view regarding Carley v. SEC, the Division's dismissal of certain wrongdoing allegations arose from of the Fifth Circuit Court remand of Carley's case making the dismissals by the SEC in actuality a requirements imposed by the Fifth Circuit Court rather than from the Commission voluntarily. Lastly, in Nicholas Howard v. SEC, again the Fifth Circuit Court found that the SEC's opinion holding Howard liable as an aider and abettor "…was confused and confusing...". Further the Fifth Circuit held that the SEC did not fully explain recklessly as an aider and abettor. In summation the cases alleged to give this Commission power were all based upon orders from the Fifth Circuit except in the Heckler matter, and that was a 1985 Federal Court order which the SEC unjustly used to attempt to eliminate my Constitutional rights to a fair trial.

EXTORTION AND COERCION

Heckler was long before the Commission's and its Division's series of predicate acts by the 4 SEC Enterprises, including 3 of its Divisions, plus the Commission itself as an Enterprise member as it aided and abetted the other 3 SEC Enterprises, which all collectively conspired to defraud me, aided and abetted by the Enterprise members and each other to commit bribery of witnesses as a tradeoff for suborning their perjury and permitted the McGrath Enterprise Members including the WMMA/WDI investor operators to extort me as discussed in the 6/19/2012 Dishonest Shareholders' Meeting.

As reported by [redacted] in the glossary of the Dishonest Shareholders' meeting he stated that he would in essence "…break Daspin's head against the wall unless he gave MacFarlane's Newco WMMA on the cheap…". It is apparent that the SEC Commissioners and their respective Enforcement Division prosecutors such as [redacted] not only permit their Enterprise Members to suborn the investors' perjury and bribe them, but to extort innocent defendants 2 months after the El Paso event in 3/31/2012. Had the SEC not involved itself in an exempt securities transaction, I and Agostini could have turned WMMA around, but the SEC gave the investor operators false hope and by bribing them along with MacFarlane's Newco bribes these otherwise seemingly honest investor operators became crooks.

Chair Commissioner [redacted] bragged about the 2022 $4 billion penalties that the Enforcement Division facilitated, yet Commissioner knew that those defendants ran out of money because they did not have a $3 billion budget from Congress. Before If a President I believe that the tiger of protecting citizens of the United States is the Supreme Court and further that that tiger by its recent findings of fact in [redacted], has decided to put the Commission in its mouth because our Supreme Court has found that this

entire Dodd Frank mess is filthy and that Congress tried to circumvent the tiger's powers. That tiger is the reason that we are the greatest nation in the world. If the President can't get away with a crime, neither can Congress permit it's SEC Commissioners to get away with many crimes against this defendant that its agent and representatives, the Administrative Law Judges committed against me.

From the very beginning, the Commission knew that the inhouse administrative proceedings violated 4 of the 10 Bill of Rights Constitutional Amendments. Upon rereading the order dismissing proceedings, it is apparent that part of the SEC's new plan for denying me a fair trial have concocted an alleged "control deficiency wherein the Commissioners allege that they are dismissing all of us as there was an alleged error of a "control deficiency" related to the separation of enforcement and adjudicatory functions within our system for administrative adjudications".

I find it incredible that the Commissioners would dismiss the proceedings they are their subcontractors, the ALJ, launched against me in bad faith and in violation of my civil rights and by this Commission not allowing me to have a fair trial and my civil rights based upon this Commission's attempt to allege control deficiency that the Commission's counsel invented as if it was relevant to my case, which it is not. The Commission alleged that there was no evidence that the control deficiency resulted in harm to me or the other respondents! However, this Commission concocted a complaint against me which alleged I was a control person when the facts proved the reverse was true; yet [redacted]

This Commissioners needs to fess up. You are members of an agency of Congress, and each of you swear as a condition precedent to holding office, that each of you will protect and abide by the Constitution and that you, as a Commissioner, swear to enforce the security laws and prohibit violators of those laws from harming our society. Your oath did not permit you to fabricate wrongdoing allegations against innocent defendants denying them and me our civil rights, and denying me a fair trial. At the same time, Congress violated the powers of the Supreme Court by encroaching on its terrain and defaming our system of Constitutional Government by eliminating a jury trial, by providing the SEC legislative powers, and by knowingly permitting the SEC to have its inhouse judges violate the Appointment Clause for 8 years after Dodd Frank was initiated.

To make matters worse Congress permitted the Commission to violate due process and to assume the defendants are guilty before they are tried!! In the guise of saving money Congress permitted the inhouse prosecutors to have up to 10 times more discovery than the defendant's lawyers by the prosecution withholding its Wells Notice and then after they filed it, forcing the defense to respond in about 60 days. Then Congress created 2 layers of cause needed to fire the inhouse judges and it gave the Commissioners the first appellate right to hear appeals on cases the Commissioners initiated in the first place. The aforementioned is a conflict of interest

because it is not just for the Commissioners issue a complaint and then after their own representatives find innocence, take the first appellate right and find those defendants guilt again. The safeguards to protect defendants were eliminated when the SEC rules permit hearsay evidence and attributable to the Commissioners' first right of appeal, they barred the Article 3 judges in Federal District Court to review and change the facts that the inhouse judges found if proven wrong. This is attributable to the fact that after this Commission hears my appeal, I can only appeal to the Circuit Court and I cannot appeal the alleged facts of my wrongdoing, but only appeal on Constitutional grounds. If Order #8 is not signed or if the case is not settled by 8/23/2023 by 5 pm, I will file a civil rights action for denial of a fair trial and I will name all of you for purposely and malice of forethought not stopping this practical joke when Judge Foelak filed her protective order.

I have Constitutional grounds to sue the Government because you violated my civil rights and denied me a fair trial. Congress had a conflict of interest by providing the Commission with its wish list for the Dodd Frank inhouse litigation process. It is apparent that Congress attempted to circumvent the powers of the Federal District Court and our Supreme Court by concocting an adjudicatory process that presumed the guilt of defendants, by permitting the inhouse judges to be agents of the Commissioners. The inhouse judges are delegates of the Commissioners so that regardless of their compliance of the Appointment Clause by a judge, after being appointed, by the judge's acceptance of their being delegates of the Commissioners, that judge now has a fiduciary to the Commissioners as the Commissioners' agent, representative, and delegate and can no longer judge independently.

I originally thought that the Commissioners were independent and would irradicate any wrongdoings within the SEC five divisions. How many more unconstitutional administrative trials must our citizens endure before getting the chance to argue our cases in an Article 3 Court? (I have given this Commission one last chance to use my plan, which is Exhibit 3 to my initial motion for reconsideration as I amended it in the other 3 reconsideration motions filed by me subsequent thereto). If you sign Order #8 or settle no later than 8/23/2023 by 5 pm, I believe that the Supreme Court may permit this Commission to save the inhouse judges and use the modified inhouse process as long as the Commissioners no longer having any appellate right as you are the ones who initiated the complaint in the first place and your administrative law judges are your own representatives. I believe the tiger will no longer permit the malconduct of the SEC Commissioners as the Article 3 courts must have the right to adjudicate each SEC case's facts. Since the inhouse process uses the 5 Commissioners and their 5 Divisions all of whom are on the prosecutor's side, the only way to even off and provide defendants pre-complaint justice is to adopt my ombudsman plan using standby Federal judges as advocates for defendants so that the Commissioners will receive a meaningful judicial review of the Wells party disputes before they permit their prosecutors bullying pre-complaint initiation settlements based upon concocted wrongdoing allegations against innocent defendants.

I now know it is impossible for the Commissioners to be impartial unless you reformat my plan and the inhouse process. If you do that you will be confronted by a standby Federal Judge as an

advocate pre-complaint initiation giving the Commissioners a meaningful judicial review. In this manner the Commissioners will know the truth about any Wells Notice wrongdoing allegations. Right now each of you are each cheering fans for the 5 division's 4500 employees that you supervise. Even SEC Chair [redacted] stated, in a recent article the press release dated November 15, 2022 captioned SEC ANNOUNCES ENFORCEMENT RESULTS FOR FY 2022. In page 1, paragraph 3 Chairman [redacted] stated:

"…I continue to be impressed with our Division of Enforcement…what stays the same is the staff's commitment to follow the facts wherever they lead…".

In the same article, [redacted], the Director of the Enforcement Division, stated on page 1 paragraph 4:

> "…as reflected in these results, the Enforcement Division is working with a sense of urgency to protect investors, hold wrongdoers accountable and deter future misconduct in our financial markets…".

Then he said:

> "… a centerpiece of those efforts is assuring that we are using every tool in our tool kit, including penalties that have a deterrent effect and are viewed as more than the cost of doing business…".

What Director [redacted] forgot to inform the public was that the Division concocts wrongdoing cases against innocent defendants like me. What Director [redacted] omitted was that his division permits some of the prosecutors that are suborning the perjury of witnesses to obtain penalties from innocent individuals!

The facts spelled out in this article prove that Congress's budget annually is $3 billion a year and that approximately 90% of the penalties come from forced Government settlements which amounted to $4.2 billion in 2022. Without the penalties the SEC lost $600 million because the SEC admits in the article that the total money it took in was $6.4 billion less $4.2 billion in penalties leaves $2.2 billion in cash flow when the cost to the SEC is $3 billion a year. It is obvious, that Commissioner Chairman [redacted] being impressed with the SEC financial performance is in part disingenuous because the Enforcement Division and the Commissioners permit the crucifixion of innocent defendants to settle penalties to break even and then to show a profit. The financial motivation of the SEC Commissioners and its judges and prosecutors demonstrates the reason that the Commissioners look the other way when confronted with the criminal conduct of some of its judges and prosecutors.

Unfortunately, I must retract my misunderstanding by thanking the Commission for finding I was not a control person. In fact, this self-serving order dismissing proceedings is further proof that I have not only have denied my civil rights by not receiving a fair trial or hearing, but that the Commissioners refused to admit that its staff and its government employees violated my

civil rights under 42U.S.C.@1983, also known as the civil rights act of 1871, a Federal law and refused to give me a fair trial. A 1983 lawsuit is the nickname for a civil rights lawsuit.

The Commissioners and the Commission's employees violated my bill of rights and denied me a fair trial as government officials that they all have the authority and/or perceived authority to carry out the enforcement of the law and they misused that authority in my case! The facts of this case are described in my appeal of Judge [redacted] October 16, 2019 initial decision and documents with respect to Exhibit B1 of my appeal on Judge [redacted]'s first 14 pages of her opinion. This addendum reconsideration motion declaration and Order #8 represents my attempt to provide the Commissioners with the facts so that instead of using a cop out, and particularly prosecuting me over six years, the Commissioners do the right thing. Settle this case so Joan can rest in peace and based upon my facts find me innocent of any wrongdoings as in Order #1 and Order #8.

Although you think you have a right to dismiss the proceedings for no reasons according to Heckler, I believe that the Commission's inhouse process and the Constitutional violations in Dodd Frank as evidenced in my pleadings and by the Supreme Court's findings in Cochran v. SEC, Lucia v. SEC and the Fifth Circuit's Jaresky v. SEC proves that the Supreme Court would not have made that finding had they known this Commission's actions subsequent to using Dodd Frank in 2010. The Supreme Court did not intend, I believe, that Congress would encroach on its powers and pervert our Constitution's rights to the presumption of innocence, nor do I believe the Supreme Court would permit the inhouse process to dramatically reduce the defendant's discovery in my case the prosecution had 18 times more discovery than my defense lawyers were permitted. I also do not believe the Supreme Court would permit that the Commissioners get the first right of appeal on the inhouse cases they initiated in the first place. At the same time I don't believe that the Supreme Court would agree that its Article 3 judges would be blocked from changing the inhouse judges' findings of fact. We have already seen that between [redacted], and the Fifth Circuit's findings in Jaresky that this Commission is not allowed to deny a jury trial to inhouse defendants; that this Commission is not allowed to have 2 layers for removal for cause and in my case I submitted the reasons that the prior Commissioners had an obligation to remove Judge [redacted] for her various violations of my Constitutional civil rights and in collusion with Judge [redacted] the prior Commissioners attempted to whitewash Judge Murray by submitting the declaration of former Judge [redacted] to the Inspector General when [redacted] declarations gave cause for the Attorney General because Judge [redacted] fixing cases against defendants is a criminal violation of the law. Now this Commission wants to cover that up with a dismissal for no cause when you denied me my bill of rights and denied me a fair trial.

Your attempt to eliminate my damages sustained as a result of your division's and your prior colleagues' violation of my rights also prove that you have disregarded the malconduct of your subordinates, particularly Mr. [redacted] and Judge [redacted], [redacted] suborned the perjury of [redacted], I.e. in 8/29/2013 [redacted] asked [redacted] who wrote the WMMA PPMs. [redacted] testified and answered: "… [redacted] wrote the lion's share…". [redacted]

[redacted]

The subornation of perjury in my case is rampant. In addition, the prosecution invented wrongdoing allegations and then described the wrongdoing they invented as if I were the perpetrator, I.e. in the Wells Notice and Complaint and as spelled out in the OIP the Government found that I disguised investment banking fees to look like human resources fees. In the 1/20/2011 five-year consulting service contract wherein my company, CBI, sold its contract for WMMA services to MKMA and in that contract I and CBI became subcontractors to MKMA with me getting half the fees charged by MKMA and the contract further prohibits me and MKMA from binding WMMA. The contract also provides that MKMA and me could not provide mixed martial arts services to any company for five years unless as subcontractors of MKMA. Fortunately, on December 2012 WMMA delivered 10,000 pages of its documents to the SEC, all of which came out of [redacted] computer. I believe the 4th document was [redacted] Chartis insurance claim, which in paragraph 6 he admits:

> "…I (Nwugugu) wrote 100% of WMMA's PPMs…"

[redacted] was listed as an SEC witness for the 2016 hearing. The reason the SEC concocted that allegation was because they alleged that I disguised investment banking fees to circumvent the Exchange Act, which requires a license by the person raising funds to receive a fee. In addition, [redacted] contravened in his Chartis Insurance claim in paragraph 6: "…I wrote 100% of the WMMA PPM…"

The SEC and the [redacted] prosecutors which the Commission initiated a complaint against me also alleged that I was a control person of WMMA. The Commission's disingenuous reprehensible concocted allegation that I was a control person is contravened by the fact that Mr. Lux's 2013 deposition disproved that when he testified:

> "…Mr. Daspin was not an officer, director, or shareholder of WMMA…he was a consultant…Daspin had to be invited by a director to attend a WMMA board meeting…none of the Directors had to accept any of Daspin's opinions…"

The Complaint and Wells also alleged I milked $1 million in fees from a startup causing it to go out of business; but the books and records we gave to the SEC in December 2012 disproved that allegation since I, CBI, and MKMA only received $240,000 in total of paid fees. Further, the SEC's own fraud analyst in her direct testimony testified that:

> "…Mr. Daspin, CBI, and MKMA in total collectively only received $240,000 in fees…two weeks before the WMMA 3/31/2012 El Paso event the WMMA financial team officers submitted a budget of $450,000 (to the WMMA Board of Directors and to the 7 investor operators and CBI, and me) for the WMMA charitable event, yet the event cost WMMA lose $1 million for that event…"

In Mr. Lux's 2013 deposition he testified that:

> [redacted] was WMMA's President and that he ran the charitable event for WMMA and that he lost $1 million at that event because of his gross negligence…"

Judicial notice should be taken that prosecutor [redacted] 8/29/2013 SEC deposition, so that [redacted] knew that the Wells Notice and Complaint against me with respect to the aforementioned deficiencies and alleged wrongdoings was completely false, yet he persisted in defaming me with reckless disregard and malice of forethought the Wells Notice wrongdoing allegations were disproven before he submitted the Wells Notice. The 10,000 pages of documents submitted to [redacted] in December 2012 disproved those allegations. I alerted the President, the Chief, and the former Commissioners of the violations to my civil rights. I alerted to the Commissioners my illnesses and that [redacted] protective order was trespassed by the Murray/Grimes Enterprise members to no avail! Yet that was the Government's allegation that I took that million in fees, milking WMMA, when the McGrath Enterprise knew 3 years before they filed their Wells Notice and Complaint against me that I did not milk $1 million in fees and it was MacFarlane that lost the million as WMMA's President

Judicial notice should be taken that the books and records of WMMA delivered on 12/2012 delivered to the SEC proved incontrovertibly that on January 15, 2011 I forgave $1 million in fees for the IMC contract and that on December 8, 2011 that I, CBI, and MKMA capitalized WMMA with an additional $3, 460,000 while we collectively only received $240,000 paid by WMMA. [redacted] In fact, when [redacted] used me to submit his claim to Chartis Insurance to receive a return of his investment because of his allegation that MacFarlane fraudulently induced him to invest, and when [redacted] did the same thing on the same day, because he alleged that [redacted] fraudulently induced him to invest after I sent their respective claims to Chartis Insurance by email around September 2012 when I became a WMMA officer from 5/11/2012 and I had exercised my wife's warrants from [redacted] and owned about 60% of WHLD which owned 90% of WMMA/WDI. Mr. Lockett kept me on the phone. In that phone call he asked me to get smart and I asked him what did he mean? He clearly stated that [redacted] has the power to stop the SEC investigation against me if I give [redacted] Newco WMMA "on the cheap without a down payment…then Then [redacted] told me if Daspin doesn't do it, he and some of the MacFarlane Newco Enterprise members knew where I lived and they have agreed to beat the shit out of me unless I gave his Newco WMMA on the cheap.The Lockett said I could solve 2 problems at the same time and then he laughed as if it what he quoted was a joke. Just read the Dishonest Shareholders' Meeting glossary under Lockett and "on the cheap" to see the threats that Lockett orally threatened me as above declared by me.

The Wells Notice, OIP, and Complaint alleged the following wrongdoing allegations against me:

1) Daspin and MKMA appraised the IMC database of 830 million double opt on emails as having a FMV appraised value of $83 million. The Complaint alleges that:

> "…the reason Daspin exaggerated the IMC value on WMMA's balance sheet which Mr. Sullivan prepared was to defraud prospective investors…"

The facts prove that the Government's [redacted] disclosure document in the [redacted] section and [redacted] was IMC's owner:

> "…I was offered $40 million from one buyer and $90 million from another buyer to purchase the IMC database…"

[redacted] admission proved that the Government knew that my fair market appraisal of the IMC database was conservative and was $7 million below the highest offer he had received. Another willful, malicious, disingenuous wrongdoing allegation against me that the prosecutor's own facts disproved their allegation.

2) The Government alleged that I exaggerated the projections in the WMMA PPM to defraud prospective investors, yet in his direct [redacted] testified:

> "…I and [redacted] wrote the WMMA projections…"

[redacted] was a witness for the SEC and he was the President and Secretary of WMMA prior to MacFarlane becoming President and after MacFarlane resigned, he became President again. Main was one of 3 Directors of WMMA and as you will see below, Main admitted that he and Mr. Lux collectively controlled WMMA without anyone else's opinion.

3) As my Wells Reply disclosed Federal Bankruptcy Judge, Judge [redacted] found as fact with her trustee [redacted] in 2014 in the WMMA Chapter 11, that:

> "…Mr. Daspin committed no wrongdoings at WMMA…"

Since the Wells Notice, OIP, and Complaint were filed in 2015, the Government knew they should not have sued me, because the elements they had in this case proved they knew I was not a control person by [redacted] 8/29/2013 testimony and because the books and records that WMMA delivered in 12/2012 proved WMMA was controlled by the shareholders voting in the Directors, and the Directors having final control. [redacted] had direct knowledge of the WMMA/Daspin/CBI/MKMA 5-year consulting service contract because in 8/29/2013 when he subpoenaed [redacted] he had [redacted] testify about that very contract and in it [redacted] testified that:

> "… Daspin was not a WMMA officer, director, or shareholder of WMMA…he was only a consultant…none of the Board members had any requirement to honor Daspin's opinion…"

In fact, I could not be accused of any wrongdoing unless they could prove I was a control person, yet the only way they could try to prove that was by using [redacted], the whistleblower who in 6/19/2012 in the Dishonest Shareholders' Meeting directed that all the other WMMA/WDI (see my Wells Reply page 17) wherein [redacted] said:

> "…say that Ed controlled all large and small things at WMMA…but don't say that Ed controlled the WMMA Board of Directors, because Ed denied that in writing to all of us…and I will be the first to sign it…"

Because the investor operators knew that [redacted] was an overt whistleblower for the SEC transmitting their directives to her, the investors' subsequent perjury alleging I was a "control person" proves the conspiracy to defraud me by the SEC.

Therefore in WMMA's Chapter 11 in 2014, [redacted] perjured his allegation that "…Mr. Daspin directed me not to file a 1099 against WMMA…". The SEC rule permitting hearsay came in handy, because [redacted] corroborated Sullivan's perjury, but my Reply exhibits prove that alleged declaration was fake because I attached the 6/19/2012 Dishonest Shareholders' Meeting glossary under Price Water and KPMG in which [redacted] declared to all the investors, including Sullivan, that partners of Price and KPMG that WMMA was in the clear by WMMA not filing a 1099 against MKMA. I also enclose Sullivan's employment contract which proved he only reported to Main, WMMA's President.

4) Incredibly, and because Judge [redacted] was a delegatee of the Commissioners who were delegators making [redacted] an agent, representative, and fiduciary of the Commissioners. After Judge [redacted] had complied with the Constitution's Appointment Clause; but in the Supreme Court Lucia v. SEC case the lawyer representing the SEC from the Justice Department tricked the Justice's of the Supreme Court by his not informing the Justices that even if all the inhouse judges complied with the appointment clause none of them would independent because delegates of the Commissioners after each complied with the Appointment Clause, they each violated it by accepting being a delagatee from the Commissioners for each and every case thereafter!

In that regard, Judge [redacted] disingenuously in her initial decision of 10/16/2019 while continuing to be an agent of the Commissioners found as fact that:

> "…Mr. Daspin committed scienter against WMMA…"

Judicial notice should be taken that scienter is defined as knowledge of a wrongdoing and does not disclose it and participating in a wrongdoing. Five years before Judge

Murray fraudulently concocted the scienter allegation, Judge [redacted] found in WMMA's Chapter 11:

> "...Mr. Daspin committed no wrongdoings at WMMA..." (A Res Adjudicata preventing Judge Murray from concocting that scienter allegation against me.)

The prima face evidence and Judge [redacted] finding of fact in 2014 incontrovertibly proved that I committed no wrongdoings at WMMA.

5) In fact, right in front of Judge [redacted] face in my cross examination of [redacted] on one day and of [redacted] on the next day without either of them hearing each other's testimony, they each testified in essence:

> "...we both jointly controlled WMMA...we interviewed and selected the investor operators, and we did not accept anyone else's opinion on them..."

The books prove as does [redacted] 2013 SEC testimony that I was not an officer, director, or shareholder of WMMA (when it had money in its bank accounts from 1/11/2011 to 4/1/2012).

I became an officer of WMMA by [redacted] unanimously on 5/11/2012 voting me as WMMA's Senior VP Troubleshooting. The reason I took that job was because [redacted] submitted to WMMA a self-serving email as he was WMMA's United States sole regional promoter having contracts for all 8 regions. The email was 40 days after he, MacFarlane, Jeryll, and all of the other MacFarlane Newco Enterprise members had lost and stolen $1 million of WMMA's equity. The Dishonest Shareholders' Meeting in 6/19/2012 demonstrates that before we got the Wayne Craig self-serving email they all had visited the SEC's New York Regional office, in which the investors agreed to be covert whistleblowers with Puccio, the only overt whistleblower as after [redacted] directed all of the investors to allege I was a control person, on page17, [redacted] said to [redacted] and the rest of the investors:

> "...but Theresa, we already gave them all that stuff..."

The "them" was the SEC and the quote "stuff" was the alleged control allegations that the SEC needed to fraudulently concoct a securities fraud case against me. [redacted] was a member of MacFarlane's Newco Enterprise, which also included Katherine Richter, as in 2014 she suborned the perjury in the WMMA Chapter 11 of [redacted].

The self-serving [redacted] email was another one of MacFarlane's tools used to put pressure on me to give them WMMA free. He concocted the SEC case. He bribed the investor operators as discussed in the 6/19/2012 Dishonest Shareholders' meeting, and

in his effort to cripple WMMA, he directed [redacted] to threaten suit against WMMA and me in his 5/10/2012 self-serving email. In that email he admitted he stole 15,000 WMMA t-shirts (which had a retail value at $20 each for a value of $300,000). He alleged it was a tradeoff for letting WMMA use his octagon ring at WMMA's Charitable event. Only a moron or a criminal MacFarlane Newco Enterprise member could invent such a reason, because his octagon ring cost $15,000 brand new. WMMA only used it for 2 weeks. MacFarlane and Jeryll permitted him to rape WMMA, because Jeryll subsequently admitted the three of them were partners and worked out of the same building in Scottsdale, Arizona.

In the email, [redacted] and the Newco Enterprise coerced and extorted WMMA and me by threatening us that not only would he sue me, Agostini, and WMMA for securities violations, but that he would cancel the 24 Regional events in the USA that he had a contractual obligation to put on from April 2012 to October 31, 2012 in order to crown 7 USA different weight class National champions to compete against the WMMA Brazil Champions and the WMMA United Kingdom Champions and the WMMA Irish Champions. He threatened that if WMMA did not give him 25% of WUSA (WMMA USA) and if WMMA did not fund the 24 Regional events held in the USA regions' live event costs he would cancel the schedule, which WMMA needed for its operating cash flow to sell internet pay-for-view tickets. When I read Don Lockett's Brady disclosure it became clear that MacFarlane was trying to hold up Black Ops WMMA's software developer from finishing WMMA's website and interfacing it with the IMC database. In other words, Lockett disclosed that MacFarlane, Jeryll, and Wayne Craig had positioned themselves to either take over WMMA on the cheap or kill it, while Jeryll, a lawyer, and MacFarlane, who was a CPA and a crook, were still officers of WMMA and the reason the MacFarlane Newco Enterprise and the WMMA/WDI/WHLD Enterprise members both joined McGrath/O'Connell's Enterprise co-conspiring with the Murray/Grimes Enterprise Members to defraud me and aided and abetted by the [redacted] Commissioners so that unless I gave MacFarlane's Newco WMMA free the SEC's intrusion would allow MacFarlane to kill off WMMA.

In order to build up the pressure on me, MacFarlane had [redacted] sue WMMA, me, [redacted] in 2014. He sued in state court Arizona for securities fraud and in his complaint, he mentioned 2 signed contracts which he did not show as exhibits. We removed the case to Federal District in Newark, NJ and in our answer, we showed both contracts referred to in the complaint. The signed contracts incontrovertibly proved the falsity of each and every wrongdoing allegation in the securities fraud complaint of Wayne Craig. The Federal District Judge dismissed the case with prejudice proving I did not commit securities fraud. Another Res Adjudicata. In order to mount more pressure against me, MacFarlane had his [redacted], prepare 3 perjurious declarations in the WMMA Chapter 11 by [redacted]. After my 2 Reply declarations, which enclosed exhibits, proved the three were perjurers and also proved that MacFarlane's denial that he was WMMA's President as I attached 2

exhibits that he signed as WMMA's President. Without my asking Judge [redacted] found as fact that:

"…Mr. Daspin committed no wrongdoing at WMMA…"

Thus far I had not succumbed to the MacFarlane's Newco and McGrath Enterprise members to give MacFarlane's Newco "WMMA on the cheap", so MacFarlane sent another missile by suing WMMA by having [redacted] sue WMMA before the Texas Boxing Commission's Accounting Division in Dallas, Texas. Monica alleged that WMMA owed her $10,000 for its not giving her 2 events to be WMMA's event planner for April 2012 and the May 2012 alleged events at $5000 each.

Fortunately, we subpoenaed all of [redacted] records, and she accidentally sent emails between [redacted]. Those emails incontrovertibly proved that MacFarlane was suborning her perjury to shake down WMMA as an event planner. He was telling her he would back her by alleging that he had agreed to pay her for those 2 alleged events for $5000 each. The funny thing is that [redacted], WMMA's COO of Scheduling, had no events scheduled for WMMA until November and December of 2012 reserved for the 4 WMMA countries: the USA, Brazil, UK, and Ireland to fight against each other for the World Championship. WMMA schedule proved that WMMA could not possibly have given her a contract for those 2 months since the 4 countries' regional championships that the promoters held preceded the world championships. In fact, [redacted] cancelled all his USA events when WMMA didn't succumb to his extortion of giving him free 25% of WUSA and paying for each of the 24 Regional tournament events when [redacted] contract required for him to pay for those events. [redacted] lost before the Texas Boxing Commission for her claim against WMMA. At the same time [redacted] defaulted on the 24 regional events destroying WMMA's pay per view contact and in effect putting WMMA out of business. While at the same time he, MacFarlane, and Jeryll stole $410,000 of WMMA's t-shirt and live gate seat sales putting WMMA out of business while launching the SEC investigation, by launching the Boxing Commission lawsuit, by perjuring Chapter 11 declarations in opposition to my dismissal motion, and all the while the SEC Commissioners were permitting the McGrath Prosecution Enterprise members to conspire to defraud me, defame my reputation when I was knowingly innocent, and permit Judge [redacted] to fix my case against me by violating Judge [redacted] protective order, then playing musical judge chairs to get [redacted] to dissolve the protective order using a sham SEC rule 300 and then permitting Judge [redacted] to violate the Justices' [redacted] order, and then after a decision to defame me in violation of the Res Adjudicata you Commissioners permitted your own lawyer to stretch my appeal's adjudication for 3 years and 10 months despite the fact that your own Presiding Administrative Law Judge stopped the case by making the law of the case I.e. "…Daspin is too ill to testify…"

On 3/31/2012 my wife and I attended the El Paso Charitable event and counted the number of seats occupied during the intermission and right after everyone came back to

their seats. There were 5,500 seats occupied, but Ticketmaster only paid us for 1,100 seats sold. It is obvious [redacted] stole the cash from the 4,400 seats at $25 per seat for a total of $110,000 plus the $300,000 of t-shirts they stole for a combined total of $410,000. If WMMA had that money it could have jump started the tournament without USA by adding WMMA Germany that the promoters already agreed to join, but the SEC interfered and fraudulently induced the investor operators to perjure themselves, co-conspiring with [redacted] and giving a false sense of security with the investors empowering them to lie to steal back their investments. Judicial notice should be taken that research and MacFarlane proved that he was a crook long before he was President of WMMA. In fact, the internet discloses that MacFarlane represented a bank liquidating the assets of North Face, a winter apparel manufacturer. MacFarlane had bound himself to not participate in the assets he was selling. Despite that, 2 months after the sale, the bank found out that MacFarlane owned 30% of the buyer of North Face and MacFarlane rushed to the bank with a check for $1 million to settle the claim. I can guarantee you that if MacFarlane had competitive bidding, the bank would have made an extra $30 million, but the bank was too embarrassed it had selected for shareholders that it was cheated by its own business broker.

Judicial notice shall be taken that I will be irreparably harmed unless these Commissioners pay me for the damages I sustained as a result of their violations of my bill of rights and by their denying me a fair trial. Congress had no right and had a conflict of interest in providing the SEC it's legislative rights to select one jurisdiction or another. If this Commission adopts my PLAN which will require the President and Chief Justice's support, then you can save the jobs of the 5 Administrative Law Judges and add 3 additional judges all of whom will make initial decisions reviewed and finalized by the 2 inhouse judges, Judge [redacted] and another judge selected by Judge [redacted] and the then Commissioners for the then President to appoint. At the same time, all the SEC inhouse cases will be funneled inhouse after the ombudsman and advocate spend 30 days on each case, reporting to the Commissioners pre-complaint initiation a meaningful judicial review of the Wells submissions. I project that 30% of the Complaint Initiations left after the advocate's prove to the Commissioners that about 100 out of 400 Wells disputes should be no bill leaving a balance of 300 cases for Complaint initiation of which I project 100 will elect the reference to Federal District Court to obtain a jury trial. That leaves a balance of 200 cases of which I project 50 will settle out, leaving 150 cases for the 6 administrative law judges plus the 2 Presidentially appointed judges to dispose of. None of the judges will be delegates of the Commissioners and the Commissioners will have no appellate right. Based on my projection saving 100 cases, my prior submissions prove the Commission will save $150 million after all incremental expenses. The SEC rules will be changed to the uniform rules of civil procedure. There is no longer a need for the presumption of guilt as Dodd Frank has died a slow death and doesn't fit in our society.

Congress's allegation that the Dodd Frank and inhouse process will save litigation costs for the Government is false as proven by the protracted time it has taken this Commission to go over 3 times my case and the others. The first time when the judges cheated on the Appointment Clause, and Grimes defaulted me when I was in the hospital. The second time when Murray

cheated on the Justices' [redacted] order. The third time when this Commission and its General Counsel tried to conceal the Commissions' own conspiracy, fraud, bribery, perjury, coercion and extortion by trying to make my case go away using Heckler. [redacted]

I outlined the violations in my final reconsideration declaration and orders for this Commission to sign. Those violations prove that your staff and you violated my civil rights under U.S.C.@1983 and denied me a fair trial. I finally found as fact by using the inductive method of reasoning that that this Commission is also guilty of violating my civil rights by ignoring my entire case and the facts in it that prove you owe me damages. That is why I seek this Commission's approval to either settle the case or by signing Order #8 attached hereto on a confidentiality basis in which I will sign a general release against all SEC persons if it is signed no later than August 23, 2023 no later than 5 pm otherwise I respectfully request that your Secretary provide me the disc(s) of this case on that date so that I can file a lawsuit in Federal District Court against this Commission and some of its selected members. I have given you 2 telephone numbers in the beginning of this declaration, so that if you call me and for some reason I don't answer before August 23, 2023 you can call Larry May, whose number is also listed and he will find me so that I and he can return the call.

I enclose here and below, Exhibit A, my prescriptions which are the same ones I have been taking since 2015 and in part because Judge [redacted] gave me a protective order which the Murray/Grimes Enterprise violated. I enclose Exhibit B, the orders #1 thru #7 and Order #8, which I ask you to sign by 8/23/2023 or settle. The next Exhibit C is the press release which quoted on page 1 by Chair [redacted] and under him [redacted], the Director of Enforcement on page 1/8. I also enclose Exhibit D, the Cato Institute's Amicus Briefs of Lucia v. SEC. On page 1/2 it proves in paragraph 1 that "AN ADMINISTRATIVE LAW JUDGE BRAGGED ABOUT NEVER RULING AGAINST THE GOVERNMENT". Can you believe the corruption of our Constitutional rights that is permitted against defendants by your own inhouse judges? It is almost as bad as former Judge Lilian McEwen's declaration to the WSJ that:

> "...Judge [redacted] pressured me to find more cases for the prosecution..."

Congress permitted Dodd Frank to permit your inhouse judges and your prior Chief Administrative Judge to boast about denying innocent defendants their respective civil rights and a fair trial while having the audacity to brag about it and or fix more cases for the prosecution by fixing more cases against defendants by your own prior Administrative Judge.

In closing, I can see by your resumes that you are all extremely intelligent and so in particular I ask Chairman [redacted] to settle, else there is the distinct possibility that when I file my case against the Government for denying me a fair trial and my civil rights that some of the remaining 41 case defendants that were dismissed on June 2nd which will probably also latch on to their respective denial of justice and in those cases which were denied a fair trial it could cumulatively cost the SEC billions. As you know the law supports settlements between adverse

parties. I don't want to sue my country and neither should you. If you settle, no one will know what you have done to me, as I have agreed to sign a gag order. Your predecesors force me to be a pro se when they knew I was too ill to testify! Please don't think that the Federal District Court will deny me the courtesies that forced Pro Se(s) need help.

The cases which this Commission used wherein the Supreme Court permitted it not to have to adjudicate the appeal is completely differentiated from my case and its facts, I.e. Heckler had already been convicted of criminal wrongdoing by the Justice Department, so obviously the SEC's findings whether on the record or not for the same civil crime would be meaningless and redundant.

I am not a lawyer, but a pro se. The SEC prosecution and Judge [redacted] forced me to be a pro se because they defrauded Federal Judge [redacted] and me; forced me to spend my litigation fund in the wrong jurisdiction. I finally received the protective order from Judge [redacted]. Judge [redacted] violated her protective order 3 times over a sham SEC Rule 300, when Judge [redacted] had already taken that Rule 300 into consideration before she signed the protective order! Despite Rule 300 disfavoring adjournments, [redacted] Judge [redacted] found that I failed all 7 factors. To compound the violation of my civil rights, Judge [redacted] dismissed my law firm knowing it would force me to be a Pro Se because he also dismissed my lawyer's motion to give me 60 days to replace them. Judge [redacted] refused my appeal for her to reverse Judge [redacted]' sinful order dissolving my protection and forcing me to testify. Judge [redacted] then forced me to be my own law firm. By doing so, Judge [redacted] knew I could not only not adequately defend myself, but he denied of my civil rights to a fair trial persisted and then he defaulted me when I was hospitalized during the hearing. [redacted]

In addition, Judge [redacted] violated the Supreme Court Justice's [redacted] order as it restricted her from hearing the second hearing after she obtained the Appointment Clause compliance. She refused to recuse herself when I motioned her to do so. Judge [redacted] alone was responsible for orchestrating and initiating the default judgment with Judge [redacted]. Based upon the [redacted] order I had an absolute right for her to recuse herself. In addition, Judge [redacted] she had a monetary interest in finding me guilty in the second hearing. The reason she violated the Justice's order was obviously for Judge [redacted] to be able to say when I sued her for Civil Rico with the other SEC Enterprise members that she could say the only reason I sued her was that she could say that the only reason was because she found me guilty in this case (a sour grapes defense).

[redacted]
Administrative Judge ordered as fact that if I was forced to defend myself, I would be irreparably harmed. This Commission denied me my civil rights and denied me a fair trial. I now give it the right to cure the damages it inflicted on me. If you do not sign Order #8 or settle

before 8/24/2023 ask Ms. Countryman to deliver the disc(s) to me. Please try to look at it in my point of view.

Respectfully,

[redacted]

Edward M. Daspin

[redacted] pro se

Securities and Exchange Commission

Commissioner Order #8 8/__/2023

Based upon this Commission's review of Mr. Daspin's 8/17/2023 declaration for reconsideration and his proposed settlement contained therein, this Commission finds cause to pay Mr. Daspin for his punitive, compensatory, and nominal damage:

1)$17 million representing his average projected losses of pretax income for 10 years commencing the beginning of 2013 until the middle of 2023 at an average of $1.7 million per year. This is what Mr. Daspin represents is the average pretax fees he received and invested in as capital in the two startup companies he co-founded from the beginning of 2007 to the end of the first quarter of 2012, wherein Mr. Daspin represents his total fees were $8.5 million for those 5 years.

2)In addition, Mr. Daspin's wife and Mr. Daspin collectively during the period from when the SEC interfered with my life and informed me I was a target lost $2.5 million of their assets as a direct result of the SEC's actions against Mr. Daspin and as described in the attached declarations.

3)In addition, Mr. Daspin seeks $1 million a year for each year he lost his wife's companionship attributed to her [redacted] which Mr. Daspin represents was directly caused by the Government's intrusion on Mr. Daspin disingenuously making him a target of securities fraud violations while the prosecutors knew he had no control and knew he was not an officer, director, or shareholder of WMMA for a total of $10 million.

The total compensation for damages Daspin claims he is $29.5 million due for the Government denying him a fair trial and violating his civil rights.

If Daspin receives this order settlement by 8/23/2023 or accepts the Government's settlement offer, Daspin declares he will sign a general release in favor of all SEC, its current and prior officers and any witnesses against intended or used at his 2nd hearing, and all witnesses purported to be used in this case.

_____ _____

By the Commissioners date