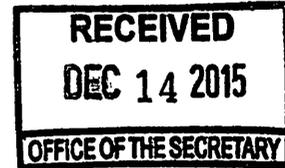


3-16509

12/8/15



Mr Brent Fields;

Enclosed is a supplemental motion to the request that the court, Sua Sponte, halt the proceedings and /or dismiss as the commission permitted the complaint to be filed against the defendants based upon fraudulent information obtained during debriefing of Mr Nwugugu, Mr Burnham, Mr Lockett, Mr Main, Mr Sullivan, MR Heisterkamph, Wm Macfarlane, Ms Puccio etc; by the SEC Prosecutors Mr O Connell ,Mr Mc Grathand Mr Kolodney. The exculpatory evidence recently transmitted eliminates any like hood that the Prosecution has any information left which would warrant prosecution of the defendants!

The exculpatory evidence compared to the signed documents and /or emails of the aforementioned categorically individuals proves that the SECS' complaint is defective and its prosecution would make this proceeding a matter of prosecutorial misconduct, in light of the new information that has come to light. Futher if my motion is not granted I will incur irreparable/ imminent harm independent of the illness that I have; be a waste of the courts time as well as the Governments time.

Since the government has sovereign immunity I can't be recompensed and now that the proofs contravene the lynchpins of the Prosecutions allegations' I have requested that the court weigh the evidence and dispose of this matter as the court sees fit.

Under the circumstances and for the health reasons also associated herewith; I respectfully request that the court compel the SEC to either cease and desist further prosecution until the court either halts this matter and/ or dismisses and or halts it on its own, for the reasons recited in my pleadings.

Respectfully

A handwritten signature in black ink, appearing to read "E M Daspin".

E M Daspin

Pro SE:

Service list: By Email

Cc K Mc Grath ,Mr Kolodney, Perlman, Ben,

Agostini, Luigi, M Shapanka

Case 3-16509 12/7/2015

Edward M Daspin

██████████ Boonton N J ██████████

Cell ██████████ ██████████

Dear Judge Grimes; I swear under penalty of perjury that this supplemental declaration in further support of my motion for this court to halt the hearing until the SEC either amends its disingenuous complaint [which evidence recently came to light by the prosecutors being honest enough to provide me with Exculpatory evidence. One piece of evidence is the recanting, by M Nwugugu, of most of the allegations he made to The SEC at previous hearings and or debriefings that the SEC relied upon to obtain the Commission's approval to institute the action in the first place.

Mr Nwugugu's claims to Chartis Insurance were in he admits being the author of the **Words and the Protections** contained in **both the WMMA and the WDI 506 reg D PPMs**, as contained in his Insurance claim seeking \$650,000.00 proves that the information he fed the SEC was disingenuous; that his motive[s] were: 1] to save himself from being a target and.

.2] to get even with me as My recommendations' reducing his percentage of the discount given by MKMA to WMMA for redistribution!

Proves that he was the preparer and author and that the SEC's allegations to the contrary are one of the lynchpins upon which they were led to accuse me of participating in an alleged fraud! [THEY GOT THE WRONG DEFENDANTS AS LUXS Deposition also admits it was Nwugugu that performed the Lions share.]

I also sent a request to Mr Kolodny and Mc Grath for them to drop the current complaint as it was used to fraudulently allege wrong doing improperly and untruthfully ascribed to my actions when the conduct of Nwugugu, Puccio, Sullivan, Lockett, Heisterkamp and Bernham and the financial investors, Doug Main and Wm McFalane are proven responsible as the below stated evidence proves'. I addressed these concerns to them as below stated and I declare under penalty of perjury that the facts pled herein below are true and correct and that I know I am subject to penalty if willfully false. IN addition I have also Included Mr Agostinis' email to counsel which points out with specificity the proofs he has with respect to the SEC's claims against us being baseless and accusatory against these defendants when the persons mentioned above **were the people at WMMA that received the financial information** that they alleged to the SEC that they were deprived of the financial information !! They did receive it and they pretended they did not have access and pretended they were victims when they weren't!

'Dear Mr Kolodny and Mr Mc Grath ; I ask you both to please consider dismissing the complaint and or halting the proceedings until you amend your complaint as your current complaint has been corrupted and contravened by my motions' declaration' documents' with explanatory comments The substance of the Res discussed herein below.

I respectfully request that you contact me to discuss the aforementioned so that the court is not embarrassed having to take actions which will be embarrassing to say the least and may put your team in disfavor for filing a complaint against the wrong parties namely myself and Mr Nwugugu and Mr Lux.

The settlement that he was forced into as a result of his financial disposition was unfair as the man did not do anything wrong except come to work every day and do his best to cooperate WMMA with Doug Main and then Wm Mac farlane running it into the ground.

Since I do not want to make a mistake in who should and who should not be copied and since Kathy Shield's has been so kind to me over the last several months' I believe it appropriate that I voice my concerns![I also intend to supplement my motion with the proofs that I have enumerated herein below]

This lawsuit is becoming more like a charade every night I sleep on it.

It has disrupted my life, made me look like a criminal when it was I that invested with my family over \$3,000,000.00 and blood sweat and tears only to be prosecuted for the incompetence of others., and alleged findings, that we all know now are untrue, based upon the SEC Prosecution team bringing to my attention exculpatory findings of new facts that completely contravene the allegations of "facts" alleged in the complaint.

I have motioned to the ADJL, The HON Judge James Grimes, for a halt to this proceeding for many reasons, but the most important reason is the fact that the SEC Commissioners approved a complaint whose allegations were untrue as it apparent that the prosecutors fashioned a substantial portion of the case around Mr Nwugugus' debriefing allegations. Now Mr Nwugugu has admitted that the allegations that the SEC used that he fed them were either untrue and/ or as I have pointed out were contravened by his claim to Charis insurance for \$650,000.00

SEE the Charis insurance claim N1173-N118N para 40[2ndpara]:

.."I prepared the above mentioned agreements because WMMA/WDI DIDN'T HAVE GENERAL COUNCEL..AND I HAD MUCH BETTER WRITING SKILLSTHAN EMD[ME],Andrew Young.. and Richard Bernham [SVP of human resources]...I also was the only person that had the requisite business ,law, accounting, securities law and tax skills to work on,,,"

One of the documents mentioned above are discussed in NN1175 Para6:

... "[I] Prepared WDIS strategic plan and rule 506private placement memorandum[PPM]..prepared the 3 year forecasted financial statements..'

See para 7:

..." [I] Prepared WMMA's strategic Plan and rule 506 Private Placement memorandum [PPM]-..prepared 3 year. 'forecasted financial results.."

THERE IS NO REASON THAT THE SEC SHPOULD NOT RETRACT THIS MAJOR ALLEGATION AGAINST ME.

The man admits he wrote it,luxs deposition of Oct 16,2014 by the SEC admits thati did not type andor compute and Nwugugu has admitted that as well. If the WMMA PPM is alleged to be fraudulent than Nwugugu should stand up and accept the responsibility, he asked Charis to award him\$650,000.00 for. Not me .I want the court to understand that the WMMA PPM were well written and there is no truth to the Secs allegations against the preparer but the secs allegation making me defend a work product that I did not prepare nor file is unjust.

Then the SEC blames me for knowing and or should have known that the investors that signed the subscription agreements were not accredited in 3 instances ;further they allege that I caused that the financials not be audited and or the ppms do not contain audited financials:

With respect to my knowing and/or should have known the court was presented by the subscription agreements in my motion for a halt until the sec either amends the complaint or until the Sec dismisses the complaint.

1]All WMMA/WDI subscription agreements were signed by the investors who admitted they were not coerced and did so of their own free volition to warrant that they were accredited

2]M, WMMAS SR VP Human resources, Mr Richard Burnham, who was directly paid by WMMA 50% of the Human resources fees is a credit expert He owned a mortgage bank during the time he worked part time for WMMA /WDI and he was an executive in a credit restoration company at the same time as well .He countersigned every investors subscription agreement and was uncharged to advise WMMA and MKMA if there were any credit issues for each applicant. By signing the subscription agreements, he too was advising all parties including me that the individuals had the credit credentials they alleged. He the same rule applies as Mr Burnham received compensation for opining that each investor had the credit they alleged . Neither I and or Agostino can't be held responsible for an error as all precautions that any reasonable person would take were taken to validate they were whom each alleged he/she was. I can't be held responsible as I took all appropriate safe guards and both individuals agreed as to the credit worthiness. Therefore, the complaint must eliminate the allegations.

3]Since Mr Nwugugu' admissions as in the Chartis claim exculpate me and Mr Agostini. There is no need to allege that the WMMA PPMS and WDI PPMS' did not contain audited statements as Mr Nwugugu advised Chartis, and rightly so that he had the expertise that I did not have and that he was an expert I securities laws "if the Laws of rule 506 require audited financials than its his error was not mine; however, the Audited financials were requested by me to be inserted into the financials as there had been no revenue so it would only be a balance sheet. Unfortunately, all Investor financial officers, Mr Main and Mc Farlane refused to provide the audited statements and in February MS Puccio reported that WMMAs' books and records [with 4 financial individuals running the WMMA/WDI start- ups financials] ie; Sullivan ,Bejedekian, Puccio and a bookkeeper that they hired] were unable to perform the tasks that each was hired and paid to perform. Yet the SEC blames me! {this is lunacy}

A] SEE MS Puccio ex P 1478;

.."[top] "I would not recommend that we let Mc Gladrey know that we are planning to delay the audit'

B]See Puccios' P1509, March 23, 2012 email to Mc Farlane ,Main, lux, Sullivan et al:

.."Bill[Mc Farlane a CPA and the President of WMMA at that time] recommends that we have the 2011 & 2012 audit done together at the beginning of 2013.."

In addition the SEC tried to also blame me for Mr Lockett and Heisterkamph alleging that the IMC database appraisal of \$83,000,000.00[which was accurate when made and made by a consensus of 5 investors me and theme and Larry May]and the Alleged \$33million in cash on the JAN 5, 2012 WMM PPM were the reasons that Lockett and Heisterkamph invested their money fabricating a claim that was

false to begin with and the admissions of Lockett and Heisterkamp in their respective Chartis claims proved that it was not the reason for the investments at all in any event.

At this juncture the facts as told by [INVESTOR] Don Locketts' email of July 11,2012 **SEE Ex P1533** he states:

. ""It was you who led the charge bringing ed down with your premature e mail; it was you who stated there was a Ponzo scheme going on in DEC 2011;..it was you[**she was the chief operating administrative and financial officer of WMMA/WDi**],but never told any investor;.... It was you who told Darin that the 401K funds could never be used as operating cash ,but **it was you that were the head of finance and APPROVED EVERYTHING**,.....it was you who conspired to get us all to sell the company on the cheap!!

[while they were officers of wmma they had the secret dishonest shareholder meeting 6/19/12] and planned to push me against the wall and soften me up so Mc farlane, who had promised them stock in Newco and to pay them salaries if they tried to force me to give Away WMMA for no money];... it was you who prodded me to get my second tranche even knowing the shape of the company.... it was you who walked away from the company [all the investors, after they lost their investment by forcing a 3/31/12 wounded warrior charitable event that was directly opposite the wmma mission statement to not take a promoters risk]decided to play ill and or pretend they would work out of their respective homes instead of fighting back restructuring the company and providing the sweat equity services contained in their respective employment agreements as the other sweat equity partners disappeared after they failed to force a sale against their own wmma shareholder and officers interests] ..;**it was YOU WHO LEID AND SUCKERED GREG[Lange],Darin and I to invest in this company because you were enamored with bill.. you are a liar and shall be held accountable. .so you should stop with your underhanded treachery."**

So much for who the 2 investors that invested after jan 5,2012 alleged made them do it .Lockett informed the insurer of the truth as filing an insurance claim with fraudulent allegations is attempted insurance fraud ;So did Heisterkamp allege the reasons that he was allegedly duped by Puccio and Mc Farlane !Not Me; and Nwugugu also filed his Chartis claim accepting the responsibility for the WMMA?WDI PPMs and asking for \$650,000.00 and it was Richard Burnham who did his job as best he could and was conned into believing that the Investors were all accredited .In addition Mr Main and Mr Lux had a legal obligation to inquire as to each person's accreditation as they permitted the applicants to invest and signed them up as company employees.

What then am I accused of that I committed?

- 1]I am accused of providing these company's \$3,00,000.00 credit and loans,
- 2] Of working 1 hour days and never receiving one cent for the hourly rates that were all deferred and fully subordinated to the employees deferred salaries.
- 3]I am accused of letting my wife loan the company Approximately \$300,000.00 and signing up about 60 contracts to benefit WMMA
- 4]I am accused of not running when the 7 investors' quit WMMA/WDI by hook and or crook.

5]I am accused by the investors of not letting them coerce me and or Mr Agostini to give WMMA away on the cheap to protect the WMMA shareholders.

6]One thing is for sure.

I was not running WMMA not the WMMA board which was comprised of a majority of disinterested directors. I was a consultant who disclosed my identity to each and every employee before they signed their respective employment and/or subscription agreements. I did not vote on the board and I did not have the power nor did WMMA as the SEC alleges to control WMMAS bank accounts

A] Here is who had the power. **SEE Doug Mains Organizational chart EX m 1131:**

[I'm not in it and Doug Mains at the top of the food chain. everyone reports to him he was a power hungry little Medicare fraudster who failed to inform Medicare that he charged me for 6 adjustments micro wave heat treatment from WMMAs office and did not make up the treatments he charged me for and billed and collected from Medicare.

B] **SEE ex M1137 A Main e mail, of Jan 9,2011, to Mike N[Nwugugu]:**

..”So based on our membership project that regional fight membership will be 12.5%[Of Ufcs 4.5million-see the above assumption re ufcs 30% of 4.5million members][12.5of \$1million =125,000.00]; 25% ¼ final, 40% of the semi’s[400,000 viewers] and 50% of UfCS” 1,000,000=500,000 viewers]For country corporations assume the same percentages..”[So it was Main and Mike Nwugugu all the time but the SEC likes to blame those that can’t fight back!] LOOK at EXMA WMMA/WMMAH/WDI corporate board resolution authorizing bank resolutions on Jan 12,2011 with see **2B Doug Main Secretary the Secretary** and president Job has the power to select the signature cards on bank resolutions le;

See M1141and Mains signature as Secretary on **EXM 1143 and on M 1144 Mr Main elected the 4** signatures with all signatures contained therein le; Mr Sullivan [authorized rep; Lux, Puccio, and Agostini.

That’s who controlled WMMA’s financing if they wanted to exercise their respective authority.

In addition, the SEC knows that all the books and records were controlled by Ms Puccio, as she asked the financial investors and Mr Main to delay the WMMA/WDI audits:

In other words, all the documents and the org charts and the admissions for the insurance claims contravene the SECS’ control allegations the investors state who was responsible until they realized that they owed the IRs a fortune because they used the pension funds and did not pay the advances that WMMA made from their respective investments.

The only way they can try to avoid the 50% penalty on the \$2,400,000.00 or \$1,200,000.00 plus accrued interest brings the total to \$1.5million that they have cheated the government out of while they breached their employment agreements aided and abated the mc Farlane enterprise to try to steal the WMMA assets and This case against these defendants is in fact bogus.

This court is respectfully requested to halt these proceedings as I do not have the stomach, to even try to look at the individuals that defrauded the SEC and that’s why the complaint must be amended and or dropped. Further it is your duty to bring this to the courts attention. This court has now received

incontrovertible proof that the SECs allegations are contravened, not by my hand, but by the hand of your witness.; and the investors that lied for the privilege of investing in WMMA/WDI.

In closing the fact that both of you have your whole life in front of you means that you have a chance to correct the wrong that you have done to me and Mr Agostini and Mr Lux who pled out of fear and the fact that the poor man had one [REDACTED] and I know the pressure on him unless you stopped pursuing him could have killed him. He had no recourse but to capitulate even though innocent. Give him back his reputation as he did no wrong doing. He admitted he was independent and that I was a consultant and so did Main by his own hand as I have explained and by his email representations. He knew he was the leader as his organization chart and email to Barry Jaryell prove.

Please uncorrupt the complaint and eliminate all the disparaging allegations that are contravened by your own exculpatory evidence[thanks] and the exhibits I have referred to the court and those contained herein

Respectfully

E .M Daspin Pro see