

Affidavit of Erwin Dass

I, Erwin Gideon Dass, hereby declare as follows:

1. I am an individual residing in Irvine, California.
2. From June 1999 to October 2004 I worked for Fax.com as the Director of Graphics.
3. I have the original source files for every fax that was sent out by fax.com during its history.
4. I have examined the file properties of the files for the faxes that promoted stocks TWTN, AHFI, and CNDD that were provided to us by Camelot Promotions.
5. Based on my examination of the file properties of those original files, I believe that the following files were created by Paul Spreadbury of NOSoonerSaid because his name (and company name NOSoonerSaid) is listed on them:

AHFI: 6-14-04, 6-15-04

CNDD: 8-4-04, 8-9-04

TWTN: 6-7-04, 6-8-04, 6-11-04

6. Some files (such as 2 promoting AHFI and 4 promoting TWTN) were created Chad DeGroot. I know this because his name is on the files.
7. Two of the files (TWTN 8-2-04 and CNDD 8-24-04) are associated with an AuthorEmailDisplay name of "Jessica" with an AuthorEmail jjd615@bellsouth.net. Both of these files have very similar graphical appearance, although one is called INVESTORLETTER (MARKET CENTS) and the other is called MICRO-CAP (HOT STOCK PICKS!).
8. The file CNDD 8-19-04 has an Author of "xx" and Title and Company of "none." That file is virtually identical in layout to the CNDD 8-24-04 file of the previous paragraph with only the price changing in the content. The 8-24-04 file also has an Author of "xx" and Title and Company of "none," but this file has additional AuthorEmail information cited in the previous paragraph Therefore, due to the strong similarities, these two CNDD documents, it is reasonable to believe they were created by the person Jessica with email jjd615@bellsouth.net.
9. I believe the files created by "Jessica" were created by Jessica DeGroot aka Jessica Jaynes. I believe this is the case because 1) Both Chad DeGroot created TWTN ads and Jessica created TWTN ads, 2) Chad DeGroot is married to Jessica DeGroot (per Google search) aka Jessica Jaynes, 3) both Jessica and Chad DeGroot are associated with stock touts of these particular stocks (per Internet search) 4) jjd could stand for "Jessica Jaynes DeGroot", 5) I e-mailed jjd615@bellsouth.net and asked for Chad DeGroot's email address and got an answer back.

10. One file (AHFI 6-17-04) was created or modified by Bryan Kos. I believe this to be true because the name "Bryan" is listed on the file and the company name on the file is "IOPS." Based on an Internet search for Bryan IOPS, I discovered that Bryan Kos is President of I-ops.com which is a stock promotion company. This was the only association in the 480 documents found that made perfect sense (Kos and IOPS). Also, the _EmailSubject property of that file was "Acct Camelot." And there is a web page on www.junkfax.org that connects Bryan, IOPS, and AHFI so I am confident that this file was created or modified by Bryan Kos.

11. One file (AHFI 6-15-04) has an AuthorEmailDisplayName "Javier A. Cuadra" and AuthorEmail javieracuadra@bellsouth.net. I believe this to be the same Javier Cuadra of Camelot Promotions since he provided the files to us and all of the information (his name and email) matches the billing information he gave us.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of January 2005, at P.O. Box 17383, Irvine, CA 92623.

A handwritten signature in black ink, consisting of a series of loops and strokes, enclosed within a hand-drawn oval border.

Erwin Gideon Dass
Former Director of Graphics
Fax.com