

Mr. Plaster got involved with in Branson that looks extremely similar to the now defunct MLC project. This individual can be very helpful in confirming the political and financial benefits that Mr. Plaster may have had by eliminating key persons from the picture. He is also another individual that traveled with this Defendant to Washington D.C. and can verify many discussions as it relates to our legitimate investments. He needs to be subpoenaed to specifically bring items such as the Missouri Corporations form showing Michael Carney, himself and Robert Plaster as board members for MLC, and records relating to the D.C. trip and the meeting with John Ashcroft. Mr. Scott is vital in confirming the planned Health Clinic and how it relates to the church, the \$1.2 million that was invested and Mr. Plaster's letter on 1-3-02, that land was being released for our investment, and the promise for \$4 million dollars in return.

21. Dan and Phyllis Calkins – Former Investors
2770 Wildberry Dr
Lowell, Michigan 49331
(616) 897-9313

The government has and intends to bring forth many former investors that have lost large sums of money, how it has affected their lives and who they believe was responsible for such loss. The above former investors are in the same class as victims as well. It would seem reasonable that they be allowed to testify to their version of event relating to this matter. The above individuals may also be helpful in dispelling the "assumptions" the government has brought up concerning the honesty, morality and truthfulness of this Defendant character. They can also testify as to what kind of investment they expected to get into and what their understanding was as to the risk involved.

22. Richard Gerry – Former Associate
1169 Calico Ridge Dr
Henderson, NV 89015
(702) 497-7524

The above individual has first hand knowledge and can support evidence brought forth to dispel the government's claim of a scheme to defraud. Prior to his connection with Kramer-Wilt above and consequent plea agreement to a misdemeanor, his advice was sought out and relied upon concerning the 2001 and 2002 Newsletters. See pg 3 of See Exhibit #3. Plaster and Carney made Richard the President of MLC in the summer of 2002 and has an intimate knowledge of what MLC was all about and the legitimacy of this investment. He can help in the tracing of funds as he has close ties with Winfield Moon and the Worldwide E Corporation and is a trustee to the Starbright account from which funds were transferred from. Defendant has been charged with stealing almost a million dollars and the above individual can attest otherwise and can confirm the nature of other investments such as Crawford LTD and the MLC Development Corporation. See Item #7 of page 3 and Item #12 of page 4 of Exhibit #5. This individual needs to be subpoenaed to specifically bring the City Center wire transfer of \$1.2 million of 12-01 to Union Planter's Bank as well as any paperwork concerning Access Financial funds invested into Winfield Moon's affairs.

23. Kim Newell - Former Investor
1018 Pinckney Rd.
Saranac, Mich. 48881
(616) 897-6366

The government has and intends to bring forth many former investors that have lost huge sums of money, how it has affected their lives and who they believe was responsible for such loss. The above former investor is in the same class as well. Kim personally lost approximately \$121,000 and it would seem reasonable that she be allowed to testify to her version of events relating to this matter. The above individual may also be helpful in dispelling the "assumptions" the government has brought up concerning the honesty, morality and truthfulness of this Defendant's character. The above individual can also testify as to what kind of investment she expected to get into and what her understanding was as to the risk involved.

1 the end of the month Mr. Gerry said that he had been in
2 contact with his other advisors and he suggested that I put in
3 a letter to remove or rescind the investment contract and --

4 Q Okay. Let me stop you.

5 A So I didn't make any money.

6 Q I'll show you what's been marked as Marcusse U. Can you
7 identify that?

8 A Yes. This is a letter, demand letter that Richard Gerry
9 typed up for me and had me sign directed to Mr. Winfield Moon.

10 Q Okay. Without getting into the contents of it, that's a
11 letter that you had prepared for you, you signed and you sent
12 to Winfield, Mr. Moon?

13 A Yes.

14 Q Demanding the return of \$1.8 million?

15 A Yes.

16 MR. KACZOR: Your Honor, I'd move for the admission
17 of Marcusse Exhibit U.

18 MR. SCHIPPER: No objection, Your Honor.

19 THE COURT: Received.

20 BY MR. KACZOR:

21 Q Okay. What's the date of that letter?

22 A It's June 29, 2001.

23 Q Okay. And this is about the time that you were in
24 Europe?

25 A This was when I was in Europe.