

had any intentions to defraud investors by participating in a fraudulent scheme. His advice was sought to specifically avoid such matters.

8. Gerard M. Forrester – Former FBI Official
2600 Island Blvd.
Adventura, Florida
(305) 682 – 0117

The above individual was a government official used as a reliance to "safe" offshore banks. He considered Suisse Security Bank and Trust to be a reliable and safe bank and endorsed this bank in at least two letters. See Exhibit #4. Based on the above and other due diligence, this Defendant trusted that this particular bank would be safe for her clients. This bank subsequently failed by what appears to be a cross between U.S. pressure and political fall out in the Bahamian government concerning the renewal of the bank license. In the first week of trial, this was confirmed when the government's Federal Reserve expert admitted that the U.S. government had indeed crashed Class B banks in the Bahamas. The above individual can help support or dispel any evidence brought forth concerning this matter.

9. Brian Maisel – Former Associate of Crawford LTD.
3405 East River Dr.
Green Bay, WI 54301
920-983-6734
Work – (920) 983-8558
Cell- (920) 680-0312

The above individual can confirm approximately \$4.1 million in investments currently ascribed as "spending". He is necessary for important information concerning investments with Robert Rydberg, deceased as of January, 2005. A speedy trial would have enabled Mr. Rydberg's testimony however Mr. Maisel is needed now for further support. See Item #8 of page 3 and Item #12 of page 4 of Exhibit #5.

201 F.3d 1250, 1255 (9th Cir. 2000) ("A district court can properly deny a Rule 17(b) subpoena request when the testimony would be cumulative."). Specifically, the Court denies a subpoena for the following witnesses:

1. Robert W. Plaster: The government has notified the Court that it will be calling Mr. Plaster to testify during their case in chief. Thus, Mr. Plaster will be available to Defendant if she wishes to call him.

2. David Pointer: Defendant has failed to allege facts that are relevant to the issues in this trial. Specifically, the failure of certain alleged investments, even if caused by persons other than Defendant, is not relevant to the charges she faces in this matter. At best, it is a collateral matter to this case.

3. Gerard M. Forrester: Defendant has failed to allege facts that are relevant to the issues in this trial. Again, the external causes of the failure of certain alleged investments is a collateral matter to this case. It is not relevant to the charges against Defendant. Moreover, the government has suggested that the existence of this person is of doubtful validity.

4. Dr. Reede Hubert: Defendant has failed to allege facts showing that this witness is necessary to her defense. The success or failure of a particular investment is not at issue in this case. Moreover, Defendant's alleged reason for calling Dr. Hubert may cause confusion of the issues and would be unnecessarily cumulative.