

## AFFIDAVIT OF ALAN WHITE

On this the 8th day of April 2014, I, Alan White of 213 Loughborough Road, West Bridgford Nottingham NG2 7EG England do hereby provide this Affidavit of facts, which are known to me and to which I will and do hereby testify.

I first met Gary McDuff in 2001 at the UK offices of Dobb White & Co. where I was a partner, doing bookkeeping and accounting. He represented a Costa Rica company that provided payment services for Dobb White clients.

Dobb White & Co. became a primary customer of a bank in Dominica. Three UK bankers, Chris Stone, Iain McWhirter, and Terrence de'Ath took over management of it while they sought approval from the Dominican government to purchase it. Mr. McDuff was appointed to the Trust Department and dispatched to open Treasury accounts for the bank. He established Treasury accounts in Mexico, Belgium, and Panama.

The Dominica bank offered insured certificates of deposit, which were protected by a Dobb White Lloyd's insurance policy, structured by UK attorney, Colin Riseam. Mr. McDuff was placed in contact with the insurance broker who wrote the insurance policies. He obtained updated policy information from John Sevastopolu of First City insurance group on each increase in coverage, and provided it to the bank so it could evidence the insurance being in force.

Breaches of banking regulations by the bank's previous owner, before contracting to sell the bank, required the regulators to revoke its banking license, leaving no bank for Mr. Stone, Mr. de'Ath, and Mr. McWhirter to purchase. Mr. McDuff went to work for Mr. de'Ath's Secured Clearing Corporation, to assist in forming investment funds for investors who had done business with Dobb White and the Dominica bank.

I recall that Mr. McDuff located a law firm in Texas with experience in forming investment funds in the U.S. I was advised that he met a banker in California by the name of Gary Lancaster, who met with Mr. de'Ath and agreed to be the owner and manager of one of the funds, which became known as the Lancorp Financial Fund. I was advised that Mr. Lancaster and the Texas law firm lawyer,

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Norman Reynolds, met with Mr. de'Ath in London to set everything in motion. My partner, Shinder Gangar dealt with things from this point onwards.

I was advised that the Lancorp Fund was set to be insured by Lloyd's through First City insurance brokers as soon as it raised the ten million dollars needed to participate in underwritings with Fiscal Holdings. One of Dobb White's clients in California was Bob Reese. I was advised that he was asking whether he could speak to someone in the USA who could assist him now that we could no longer assist him. Shinder Gangar introduced him to Mr McDuff. Prior to Shinder Gangar introducing Bob Reese to Mr McDuff I was advised that they were not aware of each other.

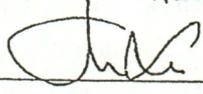
During my tenure of working with Mr. McDuff, I found him to be detail oriented, and someone who left nothing undone. He was very cautious, and, as far as I was concerned, he insisted on having legal counsel provide directives before proceeding with any project.

Subscribed and sworn on this the 8th day of April, 2014, by Alan White.



Alan White, Affiant

Witnessed by:  Date: 8<sup>th</sup> APRIL 2014  
PETER WATSON

Witnessed by:  Date: 8<sup>th</sup> April 2014  
GORDON McLEAN

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