

AFFIDAVIT OF JEFFERY STEPHEN COFFMAN

State of Texas

County of Montgomery

Affiant further testified:

"My name is Jeffery Stephen Coffman. I am over the age of 18 years, have never been convicted of a felony and am in all ways capable of making this affidavit.

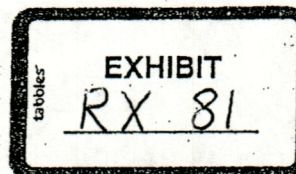
After I retired as a Supervisory Special Agent with Immigration and Customs Enforcement (ICE), I became a licensed Private Investigator (license A620963) with the State of Texas. Among my clients was a Mexican National by the name of Eduardo Trejo who was the owner of a Mexican Company called Mexbank (later changed to Mexgroup). My work for Eduardo Trejo, included telephone calls, visits to Mexbank's offices in Mexico, and work for Mexbank in the United States and Mexico. I also worked with Mexbank employees such as Adolf Norega (Mexican National) and Gary McDuff (US Citizen). I observed Eduardo Trejo give directions/orders to both Adolf Norega and Gary McDuff. Based on my observations and discussions with Eduardo Trejo, Mexbank employees, and one of Mexbank's Mexican attorneys, I am confident that Mexbank/Mexgroup existed as an actual company. I am also confident that Mexbank/Mexgroup was owned and operated by Eduardo Trejo. Based on what I know, it is my opinion that Gary McDuff was an employee of Mexbank/Mexgroup and not an owner or director of Mexbank/Mexgroup.

One of the assignments that Eduardo Trejo hired me to do was to hand deliver some documents the Securities Exchange Commission (SEC) in Fort Worth, Texas.

The SEC attorney, Julia Huseman, wanted me to give a deposition and provide her with copies of emails between me and Mexbank owners and employees. I requested and did receive a subpoena from the SEC and gave my deposition and copies of the emails. I notified my client, Eduardo Trejo of Mexbank, who agreed to my full cooperation with my giving the deposition and copies of the emails.

I explained to Julia Huseman (SEC Attorney) that had I had no personal knowledge of Lancorp Fund I or II, Megafund, or any details concerning the various persons Huseman questioned me about other than Gary McDuff, Adolf Norega, and Eduardo Trejo. I recall that Huseman queried why I, a retired federal agent, would work for McDuff. I recall that my response was that I was working for Mexbank and that McDuff was not charged with anything illegal.

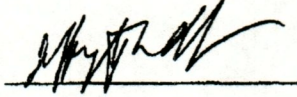
Since McDuff's arrest I have worked for him in my capacity as a Private Investigator on a pro bono basis. While I find the case interesting, I fail to see the merit of the prosecution in that it lacks evidence that McDuff violated the law. It appears that McDuff's refusal to 'kowitz' is a driving force behind the government's case. "



1 of 2



Further affiant sayeth naught,



Jeffery Stephen Coffman

August 21, 2016

