

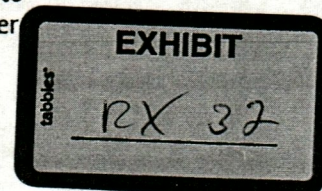
DECLARATION
OF
SHINDER SINGH GANGAR

I, Shinder Singh Gangar, do hereby make this sworn declaration under penalty of perjury pursuant to the laws of the United States of America, and further declare that the following stated facts are true and correct based on my personal knowledge. I am of legal age and complete in these matters.

1. From 2001 until October of 2002, an American by the name of Robert T. Reese had an independent professional relationship with my former chartered accountancy firm in Leicester, UK. Mr. Reese had always held himself out to be a financial planner for his client-base of many years. Mr. Reese and his clients had invested substantial sums through my firm, Dobb White & Co., which was acting to their order, until the laws in the UK prohibited the firm from continuing that practice.
2. A former, now deceased, colleague of mine, Terrence de'Ath based in the UK, had provided venture-capital funding to a man named Gary Lancaster in Portland, Oregon to create the March 17, 2003 Lancorp Financial Fund Business Trust. That fund was capable of accepting the investment monies of Mr. Reese and his clients. In early 2003, I introduced Mr. Reese to Gary McDuff who was employed by Secured Clearing Corporation owned by Terrence de'Ath. I suggested Mr. Reese contact Mr. McDuff by telephone so that Mr. Reese could ask about the law firm of Jackson Walker, LLP in Houston, Texas who prepared the legal structure of the Lancorp Fund and about Mr. McDuff's knowledge of Mr. Lancaster's professional standing and reputation as an experienced, trusted west-coast banker.
3. Prior to my introduction of Mr. McDuff to Mr. Reese, they did not know of each other as both indicated to me they had never heard of, met, or spoken prior to my introduction.
4. After Mr. Reese was told by Mr. McDuff to contact Mr. Lancaster directly to discuss obtaining information about the Fund and how clients of Mr. Reese could participate in it, Mr. Reese informed me that he intended to direct his clients to contact Mr. Lancaster about investing in the Lancorp Fund.
5. I met with Mr. Lancaster in London, UK, where he confirmed to me that Mr. Reese had sent him a number of clients.
6. I too directed a number of my firm's former clients to the Lancorp Fund. Two of which were Dr. Dilip G. Patel from Illinois, USA, and Stephen Bennett From New Zealand. Like I had done with Mr. Reese, I suggested they speak to Mr. McDuff to obtain what type of professional he had observed Mr. Lancaster to be a as banker

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Shinder Singh Gangar
7/8/15



then employed at US Bank. It is correct to say that Gary McDuff responded to their calls and informed Mr. Patel and Mr. Bennett how to contact Mr. Lancaster to get their questions about the Lancorp Fund answered. It is not correct to say that Gary McDuff was the one who initially informed them of the Lancorp Fund, because I am the one who did that. Both Mr. Patel and Mr. Bennett confirmed back to me that they purchased their shares in the Lancorp Fund from Gary Lancaster. Neither one of them reported back to me that Mr. McDuff attempted to sell them anything on behalf of Mr. Lancaster, or held himself out to be a representative, salesperson of the Lancorp Fund, or agent for Mr. Lancaster. That fact is in keeping with my knowledge of his role as an employee of Secured Clearing Corp., which is best described as providing back office support for Mr. de'Ath's projects. Mr. McDuff was not hired by Secured Clearing to solicit investors for any Fund which Mr. de'Ath owned or had reason to participate in transactions with. Independent financial planners and investment advisors were relied on for doing that, and McDuff was neither.

Further, I declare under penalty of perjury the forgoing to be true and correct.

Dated: 7th day of August, 2015

X SSGangar
Gangar, Declarant

Shinder Singh

TRULINCS 59934079 - MCDUFF, GARY LYNN - Unit: BML-U-B

FROM: Singh, Shin
TO: 59934079
SUBJECT: Janie Frank
DATE: 11/04/2015 03:06:09 AM

Dear Gary

Alan forwarded the emails you have been sending that have not been coming to me.

Please send me the telephone number of Janie Frank and I will call her immediately and give her the correct story.

You were never an introducer or broker for Lancaster . I introduced Bob Reese to you for you to give him some background on The set up and your experience and knowledge of Lancaster.

Obviously, Bob went on to do business with Lancaster.

We are praying for victory, dear brother .

God bless

Shin

