

# **FTC Exhibit 2**

**DECLARATION OF MARY ROSE LUCERI**  
**Pursuant to 28 U.S.C. 1746**

I, Mary Rose Luceri, declare and state as follows:

1. My name is Mary Rose Luceri. I am over 18 years of age and I am a citizen of the United States. I am employed by the Federal Trade Commission (“FTC”) in Washington, D.C. as an honors paralegal. My work address is 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. I have worked at the FTC since October 2010.
2. I hold a Bachelor of Arts degree from Rutgers University, The State University of New Jersey with concentrations (majors) in Economics and Finance.
3. Prior to my employment with the FTC, I worked as a senior business analyst for ICMA-Retirement Corporation, a pension management company. In this position, I performed financial and operational analyses and reporting of institutional, public-sector pension plans and publicly-traded companies. Before ICMA-Retirement Corporation, I worked as a Managing Director for Pacific Capital, LLP, an investment firm, and I performed financial and operational analyses and reporting of privately held companies.
4. The following facts are known to me personally and, if called as a witness, I would testify to the matters set forth in the following paragraphs.
5. In my capacity as a paralegal at the FTC, I was assigned to work on the case of *FTC v. Kevin Trudeau*, Case No. 03-C-3904 (N.D. Ill). In connection therewith, I reviewed voluminous corporate registration documents, monthly bank account statements, account opening bank records, and credit and charge account records obtained by the FTC for Kevin Trudeau, his wife Nataliya Babenko, and corporations

that I was informed are directly or indirectly owned or controlled by Trudeau (“Trudeau Affiliates”). I prepared summaries of these records as detailed below.

*Trudeau Affiliates Registration Records Summary*

6. **Attachment A** to this declaration is a true and accurate summary I prepared of the corporate registration and bank account signature card records regarding the Trudeau Affiliates listed in Attachment A.

*Trudeau Affiliates Bank Accounts, Total Debits/Credits Summary*

7. **Attachment B** to this declaration is a true and accurate summary I prepared of the total credits and debits for the Trudeau Affiliate bank accounts listed in the second page of Attachment B, , which I also prepared, for the period from August 2007 through April 2012. The FTC obtained these records by subpoena from the banks listed in Attachment B, page 2.

8. To prepare Attachment B, the amounts of credits and debits for each monthly bank account statement were compiled by me or at my direction, or by FTC forensic accountant Tom Van Wazer. I then entered the monthly credits and debits into a spreadsheet, summed the data, and reviewed the data and results for accuracy.

*Selected Corporate Bank Account Transactions Summary*

9. **Attachment C** to this declaration is a true and accurate summary I prepared of selected transactions from PNC Bank accounts held in the name of KT Radio Network (“KTRN”) and Website Solutions, USA (“WSU”). To create this summary, I reviewed approximately 2,000 pages of transaction records and selected records indicating payment of Trudeau’s expenses, payments to acquire vehicles, and payment of Global

Information Network (“GIN”) expenses from the PNC bank accounts held in KTRN’s and WSU’s names. I then sorted the transactions by category.

*Babenko Account Credits and Debits*

10. **Attachment D** to this declaration is a true and accurate summary I prepared of selected check and wire transfer credits to and debits from an account held in the name of Nataliya Babenko at Fifth Third Bank (“FTB”). The FTC obtained these records by subpoena from FTB.

11. Regarding the international wire transactions reflected in Attachment D, some of the destination locations were not clear from the description in the wire transfer records. To determine where the money was wired, I performed internet searches using the information in the records. Specifically, I searched for “Salkom Law Firm” and found that the website <http://www.salkom.ua/about/general/>, the Salkom Law Firm’s website, characterized Salkom Law Firm as “one of the top law firms in Ukraine.” In addition, an internet search for FBME Bank LTD showed that FBME Bank has a location in Cyprus at the address of 90 Archbishop Makarios III Avenue, which is the same address shown in the wire transfer data. See <http://www.fbme.com/easyconsole.cfm/id/60>.

*Babenko Signature Card*

12. **Attachment E** is a true and accurate copy of the signature card for Babenko’s personal account at FTB. The FTC obtained this document by subpoena from FTB.

*Global Information Network FDN Transfers to WSU*

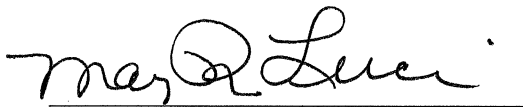
13. **Attachment F** to this declaration is a true and accurate summary I prepared of international wires from a bank account in Liechtenstein in the name of Global Information Network, FDN, to WSU’s account at PNC Bank.

*Selected Expenses Paid From Trudeau Credit and Charge Card Accounts*

14. **Attachment G** to this declaration is a true and accurate summary that I prepared of selected expenses paid from credit and charge card accounts held in Trudeau's name, between August 2007 to April 2009. My understanding is that Trudeau produced the underlying account records to the FTC in discovery. To create this summary, I used a spreadsheet containing all of Trudeau's credit and charge account expenses during the period noted above, sorted it by merchant and category of expenses, and summed the total expenses for each category.

15. To prepare Attachment G, I performed internet searches to determine the types of goods or services provided by certain merchants that were unknown to me. Specifically, I performed searches for: Mint Lifestyle; Blue Star Jets; The Ashram; Whiteflash; Auto Europe; Carey International; and Rancho La Puerta. Attached hereto as **Attachment H** are true and accurate excerpts from the web pages found for these merchants.

I declare under penalty of perjury that the foregoing is true and correct.



Mary Rose Luceri

Date: July 11, 2012

# **FTC Exhibit 2**

# **Attachment A**

Corp Name	Principal Corp Address	Corp Phone	Off./Dir./Mgr./Pres.	Incorporator	Incorp Date	State
Alliance Publishing Group, Inc.	130 Quail Ridge Drive Westmont, IL	(630) 468-2460	Neil Sant (O, D)	Jenner & Block LLP	Oct-03	DE
GIN USA, Inc.	130 Quail Ridge Drive Westmont, IL	(630) 468-2460	Nataliya Babenko (O)	Joshua Kreitzer/M. Lane	Jun-11	SD
Global Information Network FDN	3 Grant Square #302 Hinsdale, IL	Unknown	Unknown	Marc J. Lane	Unknown	St. Kitts & Nevis
International Pool Tour, Inc.	130 Quail Ridge Drive Westmont, IL	(630) 468-2460	Kevin Trudeau (O, D) Suniel Sant (Pres)	Marc J. Lane	Oct-05	DE
KT Corporation LTD	130 Quail Ridge Drive Westmont, IL	None listed	Not listed	Equatorial Trust Company Limited	Jun-94	Isle of Man
KT Capital Corporation	130 Quail Ridge Drive Westmont, IL	(630) 468-2460	Kevin Trudeau (O, D)	Marc J. Lane	Aug-06	DE
KT Radio Network, Inc.	130 Quail Ridge Drive Westmont, IL	(630) 468-2460	Nataliya Babenko (O, D) Suneil Sant (O, D)	Marc J. Lane	Jun-09	DE
Natural Cures Health Institute	130 Quail Ridge Drive Westmont, IL	None listed	Suneil Sant (O,D) Kevin Trudeau (D)	Marc J. Lane	Jul-05	IL
Natural Cures Holdings, Inc.	131 Quail Ridge Drive Westmont, IL	(630) 468-2460	Kevin Trudeau (O)	Jenner & Block LLP	Jun-04	DE
Natural Cures, Inc.	132 Quail Ridge Drive Westmont, IL	(630) 468-2460	Suneil Sant (O, D)	Marc J. Lane	Feb-11	DE
The Whistle Blower, Inc.	133 Quail Ridge Drive Westmont, IL	(630) 468-2460	Kevin Trudeau (O,D)	Jenner & Block LLP	Oct-03	DE
TRUCOM, LLC	134 Quail Ridge Drive Westmont, IL	None listed	Kevin Trudeau (Mgr)	Jenner & Block LLP	Nov-98	NV
Trudeau Approved Products, Inc.	135 Quail Ridge Drive Westmont, IL	(630) 468-2460	Neil Sant (O, D)	Marc J. Lane	Apr-11	DE
TruStar Marketing Corporation	136 Quail Ridge Drive Westmont, IL	(630) 468-2460	Kevin Trudeau (O, D)	Jenner & Block LLP	May-03	DE
Trustar Productions, Inc.	137 Quail Ridge Drive Westmont, IL	(630) 468-2460	Kevin Trudeau (O, D)	Jenner & Block LLP	May-03	DE
Website Solutions USA, Inc.	138 Quail Ridge Drive Westmont, IL	(630) 468-2460	Suneil Sant (O, D)	Joshua Kreitzer/M. Lane	Mar-10	IL

# **FTC Exhibit 2**

# **Attachment B**

## Credits & Debits Trudeau Corporate Affiliate Bank Accounts

**August 2007 – April 2012\***

<b>Top 5 Trudeau Corp Affiliates</b>	<b>Credits</b>	<b>Debits</b>	<b>Bank Signatory</b>
Natural Cures, Inc.	\$65,815,666	\$66,034,355	Suneil Sant
KT Radio Network, Inc.	37,798,999	36,739,021	Nataliya Babenko; Suneil Sant
Website Solutions USA, Inc.	37,318,450	35,652,935	Suneil Sant
GIN USA, Inc.	34,800,505	32,750,512	Nataliya Babenko
International Pool Tour	13,052,083	13,238,558	Suneil Sant
<b>Sub-Total Top 5</b>	<b>\$188,785,703</b>	<b>\$184,415,380</b>	

<b>Other Trudeau Corp Affiliates</b>	<b>Credits</b>	<b>Debits</b>	<b>Bank Signatory</b>
Alliance Publishing Group, Inc.	\$10,678,500	\$10,767,641	Suneil Sant
Trustar Productions	4,898,875	5,037,146	Suneil Sant
TRU-COM, LLC	4,490,214	4,520,544	Suneil Sant
KT Corporation Limited	3,278,312	3,563,761	Suneil Sant
Trudeau Approved Products, Inc	2,576,200	2,523,720	Suneil Sant
Global Information Network FDN	1,415,124	1,415,124	Nataliya Babenko
Natural Cures Holdings	1,633,916	1,633,916	Suneil Sant
Shop America USA, LLC	1,120,924	1,110,226	Kevin Trudeau
Natural Cures Health Institute	607,461	588,256	Suneil Sant
KT Capital Corporation	345,054	346,118	Suneil Sant
Direct Response Assoc., LLC	239,328	243,888	Suneil Sant
<b>Sub-Total Other Trudeau Corp</b>	<b>\$31,283,906</b>	<b>\$31,750,340</b>	
<b>Grand Total</b>	<b>\$220,069,609</b>	<b>\$216,165,720</b>	

\*Excludes bank accounts with de minimis activity: Next Media Group, Trustar Marketing Corporation, and Whistle Blower, Inc.

**Trudeau Affiliates Bank Accounts**

<b>Account Holder</b>	<b>Bank</b>	<b>Acct</b>
Alliance Publishing Group, Inc.	BT	4734
Alliance Publishing Group, Inc.	FM	0348
Alliance Publishing Group, Inc.	PNC	2430
Alliance Publishing Group, Inc.	PNC	5144
Direct Response Assoc., LLC	PNC	2510
GIN USA, Inc.	BT	4452
GIN USA, Inc.	BT	4460
GIN USA, Inc.	BT	4759
GIN USA, Inc.	BT	4775
GIN USA, Inc.	FM	0445
GIN USA, Inc.	BofA	6149
GIN USA, Inc.	BofA	6181
Global Information Network FDN	FT	1239
Global Information Network FDN	FT	4321
International Pool Tour	BT	4726
International Pool Tour	FM	0364
International Pool Tour	PNC	2473
International Pool Tour	PNC	5187
International Pool Tour	PNC	7847
International Pool Tour	PNC	9455
KT Capital Corporation	BT	4718
KT Capital Corporation	FM	0372
KT Capital Corporation	PNC	2747
KT Capital Corporation	PNC	8638
KT Corporation Limited	BT	4395
KT Corporation Limited	FM	0411
KT Corporation Limited	PNC	2465
KT Corporation Limited	PNC	5179
KT Radio Network, Inc.	BT	4593
KT Radio Network, Inc.	BT	4700
KT Radio Network, Inc.	FM	0429
KT Radio Network, Inc.	PNC	8264
KT Radio Network, Inc.	PNC	8475
KT Radio Network, Inc.	PNC	0103
KT Radio Network, Inc.	PNC	0277
Natural Cures Health Institute	BT	4676
Natural Cures Health Institute	FM	0437
Natural Cures Health Institute	PNC	4247
Natural Cures Health Institute	PNC	7804
Natural Cures Health Institute	PNC	9340
Natural Cures Holdings, Inc.	FM	0322

<b>Account Holder</b>	<b>Bank</b>	<b>Acct</b>
Natural Cures, Inc.	BT	4692
Natural Cures, Inc.	BofA	6314
Natural Cures, Inc.	PNC	2342
Natural Cures, Inc.	PNC	7235
Natural Cures, Inc.	PNC	7243
Natural Cures, Inc.	PNC	7446
Natural Cures, Inc.	PNC	7569
Natural Cures, Inc.	PNC	7593
Natural Cures, Inc.	PNC	8954
Natural Cures, Inc.	PNC	9164
Natural Cures, Inc.	PNC	9769
Natural Cures, Inc.	PNC	9777
Natural Cures, Inc.	PNC	9953
Natural Cures, Inc.	PNC	0096
Natural Cures, Inc.	PNC	0125
Shop America USA, LLC	PNC	2422
TRU-COM, LLC	BT	4767
TRU-COM, LLC	FM	0380
TRU-COM, LLC	PNC	2369
TRU-COM, LLC	PNC	5101
Trudeau Approved Products, Inc.	BT	4742
Trudeau Approved Products, Inc.	FM	0356
Trudeau Approved Products, Inc.	PNC	6613
Trudeau Approved Products, Inc.	PNC	6656
Trustar Productions	BT	4684
Trustar Productions	FM	0398
Trustar Productions	PNC	2377
Trustar Productions	PNC	5128
Trustar Productions	PNC	6662
Trustar Productions	PNC	9187
Website Solutions USA, Inc.	BT	4403
Website Solutions USA, Inc.	BT	4411
Website Solutions USA, Inc.	BT	4429
Website Solutions USA, Inc.	BT	4437
Website Solutions USA, Inc.	BT	4445
Website Solutions USA, Inc.	BT	4668
Website Solutions USA, Inc.	FM	0330
Website Solutions USA, Inc.	PNC	8811
Website Solutions USA, Inc.	PNC	9029

BT=Baytree; BofA=Bank of America; FT=Fifth Third; FM=First Merit

# **FTC Exhibit 2**

# **Attachment C**

Acct#	Account Holder	\$ Amt	Date	Check #	Payee	Note
<b>Vehicles</b>						
9029	Website Solutions USA, Inc.	340,319	15-Mar-11	1847	Steve Foley Cadillac	2011 Bentley
8264	KTRN	36,393	8-Oct-10	3567	Zeigler Auto Group	"2011 Jeep Wrangler"
	Total	\$376,712				
<b>Private Jets</b>						
9029	Website Solutions USA, Inc.	17,189	4-Feb-11	1689	Apollo Jets	Cruise Flight Jet for KT & guests
9029	Website Solutions USA, Inc.	22,101	19-Jan-11	1653	Apollo Jets	GIN cruise Flight/Airfare for Kevin Trudeau Jet for Kevin Trudeau Nashville Dream weekend
9029	Website Solutions USA, Inc.	23,821	19-Apr-11	1987	Apollo Jets	7/8-7/13/10 Kevin Trudeau Travel
9029	Website Solutions USA, Inc.	46,311	16-Jul-10	1103	Blue Star Jets	"Travel Exp. for K. Trudeau"
9029	Website Solutions USA, Inc.	21,618	11-Jun-10	1043	Blue Star Jets	On behalf of Kevin Trudeau 5/1/11
9029	Website Solutions USA, Inc.	12,581	13-May-11	2070	Jet Seven Nine LLC	
	Total	\$143,620				
<b>Housing Expenses</b>						
8264	KTRN	12,750	23-Nov-10	3619	Mike & Caryn Guinta	No note
8264	KTRN	12,750	29-Apr-11	3676	Mike & Caryn Guinta	"May 2011 Rent"
8264	KTRN	12,000	26-Aug-10	3515	Mike & Caryn Guinta	"September Rent 2010"
8264	KTRN	11,425	1-Oct-10	3558	Mike & Caryn Guinta	No note
8264	KTRN	12,000	30-Apr-10	3345	Mike & Caryn Guinta	No note
8264	KTRN	12,000	2-Apr-10	3288	Mike & Caryn Guinta	No note
8264	KTRN	12,000	1-Jan-10	3150	Mike & Caryn Guinta	Rent
0103	KTRN	12,750	31-Mar-11	3787	Mike & Caryn Guinta	"April 2011 Rent"
8264	KTRN	12,000	8-Dec-09	3116	Mike & Caryn Guinta	"December 2009 Rent"
8264	KTRN	12,330	4-Feb-11	3705	Mike & Caryn Guinta	Rent Feb 2011
8264	KTRN	12,598	24-Feb-11	3744	Mike & Caryn Guinta	Rent Feb 2011 (late)
0103	KTRN	11,450	4-May-11	3843	Ensure Inc.	"Maintenance at Oak Brook House"
0103	KTRN	2,202	12-Aug-11	3976	Ruff Integration, Inc.	"Wiring - Oak Brook House"
8264	KTRN	2,000	14-Oct-10	3569	3D Quality Trim	"Build Boxing Gym at House"
8264	KTRN	1,546	24-Feb-10	3232	K. Lowe Plumbing	"3108 White Oak Drive"
8264	KTRN	200	18-Nov-09	3091	Linda Dijendi	"Oak Brook House Cleaning..."
8264	KTRN	165	31-Mar-10	3280	Cornwall Music	"Moving KT's Piano"
	Total	\$164,166				

Acct#	Account Holder	\$ Amt	Date	Check #	Payee	Note
<b>Domestic Staff</b>						
8264	KTRN	2,000	2-Jul-10	3445	Matthew Green	No note
8264	KTRN	1,411	20-Aug-10	3511	Matthew Green	No note
8264	KTRN	1,363	15-Jul-10	3464	Matthew Green	No note
8264	KTRN	1,080	9-Sep-10	3532	Matthew Green	No note
8264	KTRN	16,000	15-Jul-10	3471	Robert Hanselman Domestic Agency	"Placement Fee for Matthew Green"
8264	KTRN	16,000	4-Feb-11	3721	Robert Hanselman Domestic Agency	"For Professional Services"
8264	KTRN	12,000	4-Feb-11	3720	Private Chef's Inc.	"Placement of Chef David Leigh"
Total		\$49,854				
<b>WSU and KTRN paying GIN Expenses</b>						
9029	Website Solutions USA, Inc.	298,570	27-Jun-11	W. xfer 1124	Netovative	( From Website Solutions)
9029	Website Solutions USA, Inc.	150,741	13-Apr-11	1984	Intercontinental Paris Le Grande	GIN summer conference 2011
9029	Website Solutions USA, Inc.	73,885	4-Aug-11	2398	The Hybrid Group	Expense Report August 2011
9029	Website Solutions USA, Inc.	58,030	15-Jul-11	2333	The Hybrid Group	GIN various seminars travel expense
9029	Website Solutions USA, Inc.	51,832	17-May-11	2105	The Hybrid Group	Expense Report 4/27/2011
8264	KTRN	50,000	23-Aug-10	3512	Livinity, Inc.	"GIN Inner Circle Refund"
8264	KTRN	50,000	1-Dec-09	3106	Law offices of Marc Lane	"On Behalf of Global Information Network"
9029	Website Solutions USA, Inc.	50,000	9-Nov-10	1394	Vincent Savarese	Refund for Inner Circle
9029	Website Solutions USA, Inc.	35,000	3-Jun-11	2172	The Hybrid Group	GIN seminar & training
8264	KTRN	24,589	9-Dec-09	3119	Topa Topa Travel	"GIN Founders Travel Expense - Punta Cana Semina [sic]"
9029	Website Solutions USA, Inc.	24,537	10-Jan-11	1583	Jeff Devine	GIN Inner Circle meeting
9029	Website Solutions USA, Inc.	23,627	3-Jun-11	2175	The Hybrid Group	GIN seminar & training
8264	KTRN	23,517	21-Apr-10	3317	MediaBank, Inc.	"USA Ad - 3/23/10 for GIN"
9029	Website Solutions USA, Inc.	22,889	18-Mar-11	1877	The Hybrid Group	"GIN Travel for Inner Circle"
9029	Website Solutions USA, Inc.	20,250	10-Mar-11	1820	Alternative Laboratory	Kevin Trudeau essential package
9029	Website Solutions USA, Inc.	20,000	3-Jun-11	2173	The Hybrid Group	GIN seminar & training
9029	Website Solutions USA, Inc.	19,050	17-Jan-11	1598	Loews Miami Beach	Pre- Post- Cruise Stay for Trudeau guests

Acct#	Account Holder	\$ Amt	Date	Check #	Payee	Note
8264	KTRN	12,136	9-Dec-09	3121	Topa Topa Travel	"Airline Tickets For GIN founders - Punta Cana Semin"
8264	KTRN	12,000	31-Mar-10	3280	Dr. Leonard Coldwell	Punta Cana Meeting
8264	KTRN	10,000	7-May-10	3369	RBA	"GIN Event on May 01, 2010"
9029	Website Solutions USA, Inc.	10,000	21-Apr-11	1999	Ron Ball Associates RBA	Taste of GIN Seminar Orlando Florida
9029	Website Solutions USA, Inc.	10,000	3-Jun-11	2174	The Hybrid Group	GIN seminar & training
9029	Website Solutions USA, Inc.	8,000	12-Apr-11	1980	The McClain Cos.	"April 2011 Management Fee"
9029	Website Solutions USA, Inc.	8,000	28-Feb-11	1794	The McClain Cos.	"Feb. 2011 Monthly Management Fee"
8264	KTRN	6,000	5-May-10	3325	Les Brown	"For GIN Expense - Meeting Exp."
9029	Website Solutions USA, Inc.	5,929	13-May-11	2076	Morter Health System	Consulting fee 4/11/2011
9029	Website Solutions USA, Inc.	5,384	26-Oct-10	1355	J & A postage trust	GIN Oct 2010 Newsletter
9029	Website Solutions USA, Inc.	5,016	10-Feb-11	1709	Innerworkings	GIN Oct 2010 Newsletter
8264	KTRN	5,000	2-Apr-10	3281	Dr. Leonard Coldwell	"Punta Cana Meeting"
8264	KTRN	5,000	21-Jan-10	3192	Kreskin, Inc.	"GIN Punta Cana Seminar-Appar Fee (Final Pay)"
8264	KTRN	5,000	13-Nov-09	3090	Ron Ball Associates RBA	"Global Information Network Honorarium"
8264	KTRN	3,579	27-Apr-10	3318	Prodigy Mail Service, Inc.	"GIN Member Upgrade"
9029	Website Solutions USA, Inc.	2,050	22-Feb-11	1765	Liquid Focus Direct	set up fee: Your Wish is Your Command
9029	Website Solutions USA, Inc.	1,997	29-Apr-11	2044	The Hybrid Group	Nashville Dream weekend expense
8264	KTRN	1,733	2-Oct-09	3034	Convention Planning, Inc.	"On Behalf of Global Inf. Network"
9029	Website Solutions USA, Inc.	1,536	3-Jun-11	2162	Jeanette Kilrea	GIN Paris Training Airfare
9029	Website Solutions USA, Inc.	1,209	9-Jun-11	2181	Chris McGarahan	Speaker fee 2011 cruise
9029	Website Solutions USA, Inc.	1,132	1-Jul-11	2261	InnerWorkings	5/9-5/22/11 GIN Welcome Letter Mailing
9029	Website Solutions USA, Inc.	1,000	13-Aug-10	1171	Amnae LLC	"GIN Munich travel expense"
8264	KTRN	1,000	29-Dec-09	3158	PinkImage	GIN web site expense
8264	KTRN	600	23-Oct-09	3057	Bob Trudeau	"GIN Commissions - Period #2"
8264	KTRN	315	28-Oct-09	3080	UPS store 3 Grant Sq	"GIN Mailbox Service - 1 Year"
8264	KTRN	226	20-Nov-09	3103	Lindsay Eraso	"GIN Cancun Seminar"
8264	KTRN	200	23-Oct-09	3058	Joseph Mello	"GIN Commissions Period #2"
8264	KTRN	1,287	16-Nov-09	3082	GGI-Great Guys Inc. (GGI)	"GIN Cancun Badges/Brochurs [sic]"
9029	Website Solutions USA, Inc.	15,240	29-Jul-11	2372	Prodigy Mailing Services	2012 Cruise Mailing
Total		\$1,137,086				

# **FTC Exhibit 2**

# **Attachment D**

**Babenko Fifth Third Bank Account #0335****Selected Check Credits \$240,019**

<b>Date</b>	<b>\$ Credits</b>	<b>Account Holder</b>	<b>Payor</b>	<b>Check Memo</b>
21-Nov-08	25,000	Nataliya Babenko	Suneil Sant	"Loan Repayment In Full"
5-Jan-09	8,500	Nataliya Babenko	Alliance Publishing Group	None
12-Jan-09	8,500	Nataliya Babenko	International Pool Tour, Inc.	None
4-Feb-09	15,000	Nataliya Babenko	Official Check from National City	Printed: "Kevin Trudeau" Hand-Written: "Loan Repayment"
30-Nov-09	5,000	Nataliya Babenko	International Pool Tour, Inc.	None
11-Dec-09	8,000	Nataliya Babenko	Natural Cures	"Loan Payment"
18-Dec-09	8,000	Nataliya Babenko	Natural Cures	None
8-Jan-10	44,000	Nataliya Babenko	Natural Cures	"Loan Repayment"
8-Jan-10	3,000	Nataliya Babenko	Natural Cures	"Interest Expense On Loan"
23-Apr-10	65,000	Nataliya Babenko	KT Radio Network, Inc.	"Loan 4/23/10"
4-Jun-10	50,019	Nataliya Babenko	US District Court ND IL	"Per Court Order"

**Selected Check Debits \$174,090**

<b>Date</b>	<b>\$ Debits</b>	<b>Account Holder</b>	<b>Payee</b>	<b>Check Memo</b>
29-Jun-09	25	Nataliya Babenko	Law offices of Marc F. Lane	"GIN Set Up"
11-Dec-09	1,000	Teller Cash Out Ticket	Nataliya Babenko	None
10-Mar-10	1,000	Nataliya Babenko	Titisville Dodge	"VIN 283CJ7DYY3AH190926 Deposit On 2010 Challenger"
22-Mar-10	47,162	Nataliya Babenko	Titisville Dodge	"VIN 283CJ7DYY3AH190926 Purchased By Natalia Babenko"
24-Mar-10	5,400	Nataliya Babenko	Convertible Builders LLC	"Deposit/Transport/Challenger"
30-Aug-10	32,103	Nataliya Babenko	Landmark Dodge	"Purchased By Nataliya Babenko"
24-Dec-10	87,405	Nataliya Babenko	Nataliya Babenko	"Official Check Purchased By Nataliya Babenko"

**Babenko Fifth Third Bank Account #0335****Selected Wire Credits \$322,000**

Date	\$ Credits	Originating Party	Recipient	Description
12-Feb-10	50,000	KT Radio Network, Inc.	Nataliya Babenko	"Loan Repayment"
16-Mar-10	52,000	KT Radio Network, Inc.	Nataliya Babenko	"Loan Repayment"
4-Jun-10	130,000	KT Radio Network, Inc.	Nataliya Babenko	"Loan Repayment"
25-Aug-10	55,000	KT Radio Network, Inc.	Nataliya Babenko	"Loan Repayment"
20-Aug-10	35,000	KT Radio Network, Inc.	Nataliya Babenko	"Loan Repayment"

**Selected Wire Debits \$330,299**

Date	\$ Debits	Originating Party	Recipient	Description	Location
20-Jan-09	1,500	Nataliya Babenko	Nataliya Babenko		FBME Bank Ltd, 90 Archbishop Makarios III Ave.
20-Jan-09	1,500	Nataliya Babenko	Advantage Solutions LTD		FBME Bank Ltd, 90 Archbishop Makarios III Ave.
2-Apr-10	950	Nataliya Babenko	Salkom Law Firm, LLC	"From Natalya Babenko Per Marc Lane"	43 Zhylyanska Street
10-Jun-10	15,500	Nataliya Babenko	Olga Babenko	"Charitable Assistance"	Kiev, UA
9-Jun-10	1,455	Nataliya Babenko	Salkom Law Firm, LLC	"From Natalya Babenko Per Marc Lane"	43 Zhylyanska Street
9-Mar-10	20,000	Nataliya Babenko	NBT Trading LTD		Valartis Bank (Liechtenstein) Ag
29-Apr-10	35,000	Nataliya Babenko	NBT Trading LTD		Valartis Bank (Liechtenstein) Ag
5-May-10	13,000	Nataliya Babenko	Convertible Builders LLC		
18-May-10	1,194	Nataliya Babenko	Salkom Law Firm, LLC		Public Joint-Stock Company OTP Bank
7-Jun-10	130,000	Nataliya Babenko	Olga Babenko	"Charitable Assistance"	Kiev, UA
26-Aug-10	54,349	Nataliya Babenko	Olga Babenko		(Central Kiev Branch)
26-Aug-10	54,349	Nataliya Babenko	Olga Babenko		(Central Kiev Branch)
26-Aug-10	1,502	Nataliya Babenko	Salkom Law Firm, LLC		43 Zhylyanska Street

# **FTC Exhibit 2**

# **Attachment E**

**SIGNATURE CARD**



**5/3 BANK (CHICAGO)**

(HEREAFTER REFERRED TO AS "BANK")

Name (Primary Owner) <b>NATALIYA BABENKO</b>		Account No. [REDACTED] 0335	
Street Address <b>3 GRANT SQUARE #360</b>		Type <b>FREE CKNG</b>	
City and State <b>HINDSDALE IL</b>		Zip <b>60521</b>	
Home Phone [REDACTED]	Date of Birth [REDACTED]	Mother's Maiden Name [REDACTED]	
Employer <b>SELF</b>		Work Phone [REDACTED]	
Taxpayer Identification Number [REDACTED] 0000		NEW <input checked="" type="checkbox"/> ADD <input type="checkbox"/> REP <input type="checkbox"/>	
Ownership* <b>JOINT-WITH SURVIVOR</b>	Opened by <b>BRYAN M COWAN</b>	BC No. <b>00476</b>	Date <b>02/17/2010</b>
*Joint accounts shall be owned as joint tenants with rights of survivorship, not as tenancy by the entirety			
<input type="checkbox"/> Corporation for Profit <input type="checkbox"/> Non Resident Alien* <input type="checkbox"/> LLC <input type="checkbox"/> Government <input type="checkbox"/> Non Profit [501(c)(3)] <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Partnership for Profit <input type="checkbox"/> LLP <input type="checkbox"/> Trust <input type="checkbox"/> Other _____			
*Each Non Resident Alien must complete a W-8 Form.			
<b>THE UNDERSIGNED AGREES TO THE TERMS AND CONDITIONS AT THE RIGHT.</b>			

**TERMS AND CONDITIONS**

- The terms and conditions stated herein, together with resolutions or authorizations which accompany this signature card, if applicable, and the Rules, Regulations, Agreements, and Disclosures of Bank constitute the Deposit Agreement ("Agreement") between the individual(s) or entity(ies) named hereon ("Depositor") and the Bank.
- This Agreement incorporates the Rules, Regulations, Agreements, and Disclosures established by Bank from time to time, clearing house rules and regulations, state and federal laws, recognized banking practices and customs, service charges as may be established from time to time and is subject to laws regulating transfers at death and other taxes.
- All signers hereby agree that the above named bank is authorized to act as a depository under the terms and conditions of the Agreement.
- Bank is authorized to recognize the signatures executed hereon in such numbers as indicated, for the withdrawal of funds or transactions of any other business regarding this account until written notice to the contrary is received by Bank.
- In the case of overdraft or overpayment on this account, whether by error, mistake, inadvertence or otherwise, the amount of such overdraft or overpayment shall be immediately paid to the Bank.
- Depositor acknowledges and agrees that Bank, for itself and as agent for any affiliate of Fifth Third Bancorp, is granted a security interest in, and may, at any time, set off, against any balance in this account, any debt owed to Bank by any person having the right of withdrawal or any debt owed to Bank by any entity listed under the Account Title. A debt includes, but is not limited to, an obligation owing to Bank, whether now existing or hereafter acquired by Bank whenever payable and without regard to whether arising as maker, drawer, endorser, or guarantor.
- All signers agree to the Terms and Conditions set forth hereon and acknowledge receipt of a copy of the Rules and Regulations, Agreements, and Disclosures of Bank and agree to the terms set forth therein.

Imaging 3/11/10

Title <b>NATALIYA BABENKO</b>	Sig.(s) # Req'd	[REDACTED] 0335	Non-US Person*	Senior Foreign Official**
<b>SUNEIL SANT</b>			Yes No	Yes No
<i>[Signature]</i>			<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
<b>NATALIYA BABENKO</b>			Yes No	Yes No
<i>[Signature]</i>			<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
<b>SUNEIL SANT</b>			Yes No	Yes No
<i>[Signature]</i>			<input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
<b>X</b>			Yes No	Yes No
<i>[Signature]</i>			<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
<b>X</b>			Yes No	Yes No
<i>[Signature]</i>			<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Payable on Death Beneficiary	Statement Address <b>3 GRANT SQUARE #360 HINDSDALE IL 60521</b>			

**USA PATRIOT ACT REQUIREMENTS:**

- \*1. Are you a Non-U.S. person with more than \$500,000 on deposit or invested with Fifth Third?
- \*\*2. Are you a Senior Foreign Official of a government branch, military branch, political party, foreign government-owned company, or a close personal or professional associate of one of these

**Under penalties of perjury, I certify that:**

- The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me),
- I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
- I am a U.S. citizen or other U.S. person.

**Certification Instructions - You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because of underreporting interest or dividends on your tax return.**

Sign: *[Signature]* Date: 2/17/2010

<b>Verification - Internal Use Only:</b>	
I.D. (Make Copy & File)	<input checked="" type="checkbox"/>
Run Customer in Qualfile	<input checked="" type="checkbox"/>
Verify Opening Deposit	<input checked="" type="checkbox"/>
Reg CC Hold (If Needed)	<input checked="" type="checkbox"/>
Verify Phone Numbers	<input checked="" type="checkbox"/>
Verify Address	<input checked="" type="checkbox"/>
Thank You Card/Follow Up	<input checked="" type="checkbox"/>

# **FTC Exhibit 2**

# **Attachment F**

**Website Solutions PNC Account #9029****International Wire Transfers To Website Solutions USA From GIN FDN**

<b>Date</b>	<b>\$ Amount</b>	<b>Originating Party</b>	<b>Sending Bank</b>	<b>Receipient</b>
6-Jun-11	394,970	Global Information Network FDN	Valartis Bank (Liechtenstein) AG	Website Solutions USA
21-Jun-11	813,908	Global Information Network FDN	Valartis Bank (Liechtenstein) AG	Website Solutions USA
12-Jul-11	950,390	Global Information Network FDN	Valartis Bank (Liechtenstein) AG	Website Solutions USA
20-Jul-11	750,220	Global Information Network FDN	Valartis Bank (Liechtenstein) AG	Website Solutions USA
Total	\$2,909,488			

# **FTC Exhibit 2**

# **Attachment G**

**FILED UNDER SEAL**

# **FTC Exhibit 2**

# **Attachment H**

# Mint Lifestyle Partners

<http://www.mintlifestylepartners.com/index.html>



## Mint Services

Making Time to enjoy Life

We've kept our service as broad as possible to make your life easier.

We'll organise anything and everything - or just the bits you really can't stand!

We'll help find what you need - from reliable tradespeople to that exclusive item to put a smile on someone's face

We'll fill in the gaps - the things you lack the expertise, contacts or time to arrange yourself

### Personal Lifestyle Management from Mint

Here are some ways we've already made the lives of Mint members easier:

All things pleasurable and delicious - restaurant bookings and recommendations, tickets for events, spas and weekend breaks, shopping and family entertainment

"Mint Imperial" occasions - when only the best will do, including gift buying, parties and event planning, birthdays, engagements and weddings

Home Sweet Home - helping keep homes in "mint" condition, from home improvements, interior design and vetting tradespeople to recruiting cleaners, gardeners and nannies, arranging motor purchases and sales, waiting in for deliveries - or even restocking the fridge

Stress-free getaways - researching holiday options, making bookings, organising itineraries and arranging car hire

Researching special projects - whether it's a new school with particular strengths or exploring university options or career changes

At times of crisis - cue Lifesavers, the iconic American mint created in 1912 - sharing the load of any emergency or crisis, at home or abroad

Starting a new life - taking the strain out of relocating to the UAE and assisting with the transition to this new "mint" locale



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### Mint Lifestyle MintLifeDXB

MintLifeDXB @LimeAndTonic @LimeTonicDUBAI @LimeTonicPRAGUE @LimeTonicLONDON We think you're "mint". Keep up the great work. 20 hours ago · reply · retweet · favorite

MintLifeDXB Totally uplifting! Som Sabadell flashmob: youtu.be/GBaHPND2Qjg via @youtube 4 days ago · reply · retweet · favorite

MintLifeDXB @fancyasnog So do we!!! Thanks for the follow. 5 days ago · reply · retweet · favorite

MintLifeDXB Noma Pops Up in London blog.limeandtonic.com/london/2012/06... via @LimeAndTonic 5 days ago · reply · retweet · favorite

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[Watch clip of Charlie Sheen and Michael Douglas discussing Blue Star Jets in recent movie, Wall Street 2 - Money Never Sleeps.](#)

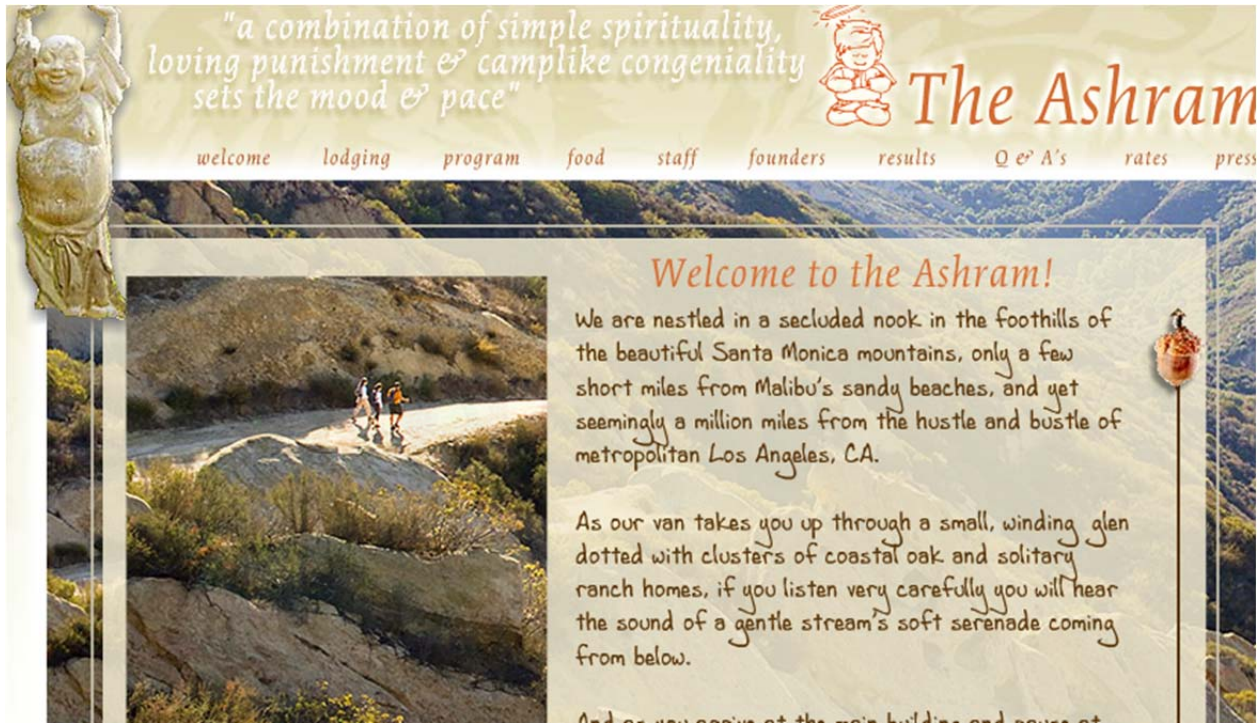
[Watch Bloomberg TV's Gigi Stone's Sep 2011 interview of Blue Star Jets founders Todd Rome and Ricky Sitomer.](#)



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welcome   lodging   program   food   staff   founders   results   Q & A's   rates   press

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We are nestled in a secluded nook in the foothills of the beautiful Santa Monica mountains, only a few short miles from Malibu's sandy beaches, and yet seemingly a million miles from the hustle and bustle of metropolitan Los Angeles, CA.

As our van takes you up through a small, winding glen dotted with clusters of coastal oak and solitary ranch homes, if you listen very carefully you will hear the sound of a gentle stream's soft serenade coming from below.

And as you arrive at the ashram buildings and gaze at

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Our 3,000-acre property ([see map](#)) offers world-class landscaped gardens, an organic farm, internationally known cooking school, and mountainsides and meadows of great hiking and walking experiences. Our health resort aims to help you develop a lifetime of healthy habits. Ours is a nature preserve that preserves people! The year-round [climate](#), poised as we are in the mountains between sea and desert, is nearly perfect, with sunshine over 325 days a year. It’s even better than San Diego’s, because we don’t get coastal fog. Approximately 125 guests enjoy our classic one-week program ([see sample Activities program](#)), arriving and departing on Saturdays. A few each week stay for three or four nights only, while some may stay multiple weeks. To hear about some of their experiences—in their own words—[read their recent letters here](#). Whatever your preference, we’re here for you.



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The screenshot displays the Auto Europe website interface. At the top, the logo 'auto europe' is visible, followed by navigation tabs for 'Car Rental', 'Resources', 'Air, Rail, Hotel', 'Agents & Affiliates', and 'Our Company'. The main content area is split into two columns. The left column contains a 'Rentals in 3 Easy Steps' progress indicator (1, 2, 3) and a booking form. The form includes a 'Pick-up Location' field with a placeholder 'Start Typing City or Airport Code', a checkbox for 'Drop off at a Different Location?', 'Pick-up Time' (Jul 13, 2012, 10:00 AM), 'Drop-off Time' (Jul 16, 2012, 10:00 AM), and a 'What Type of Car Would You Like?' dropdown menu set to 'All Classes'. A 'Get Your Quote' button is at the bottom of the form. The right column features a dark blue header 'WHY BOOK WITH US' and a text block explaining the company's commitment to low rates and customer service. Below the text is a row of four images: a red sports car, a woman in a uniform, a white van, and a dark hatchback. Underneath the images are three sections: 'Car Rental' (with links to France, Italy, Germany, and worldwide destinations), 'Luxury Car Rentals' (listing Ferrari, Mercedes, Porsche, and BMW), and 'Chauffeur & Transfer Services' (with a link to limousine services).

**auto europe**

Car Rental Resources Air, Rail, Hotel Agents & Affiliates Our Company

Rentals in 3 Easy Steps 1 2 3

**Pick-up Location**

Start Typing City or Airport Code

Drop off at a Different Location?

**Pick-up Time**

Jul 13, 2012 10:00 AM

**Drop-off Time**

Jul 16, 2012 10:00 AM

**What Type of Car Would You Like?**

All Classes

Get Your Quote

## WHY BOOK WITH US

Why should you book with Auto Europe? There are several reasons. We guarantee the lowest rates in the car rental industry. If you find a lower rate with a competitor and we are able to confirm it matches up apples to apples, we will lower our rates to get you the best deal possible. Because we are a broker, we have access to more cars in more locations, with more options than a regular car rental company. Auto Europe has the best customer service in the car rental industry. We are aware that you may need to contact us from overseas to deal with certain issues. That's why we offer a toll free phone number that you can use to contact us from almost every European country. We are open 24 hours a day, 7 days a week, so you are always able to reach a live agent in the US who can assist you.

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