

DECLARATION OF KEN REID

I, Ken Reid, make the following declaration:

1. I have personal knowledge of the matters set forth herein, except for those matters stated on information and belief, and as to those matters I believe them to be true and could and would testify thereto under oath if called upon as a witness.

2. I am responsible for providing information technology services to, and supervising the claims process for, the court appointed Receiver in the following cases pending before the United States District Court for the District of Arizona (referred to hereafter as the "Receivership Court"), *SEC v. Holt, et al.*, cause number CV 03-1825 PHX PGR ("SEC Action"), and *Commodities Futures Trading Commission v. International Funding Association et al.*, cause number CV 03-1826 PHX PGR ("CFTC Action").

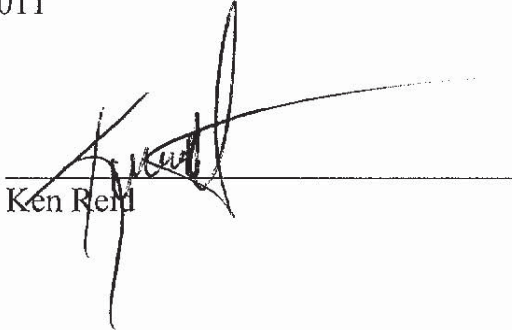
3. At the direction of the Receiver, I created a mailing database from the records in the possession of the Receiver containing the names and last known addresses of all persons who invested with the defendants in the SEC Action and CFTC Action ("Claims Database") In accordance with the Receivership Court's *Order Establishing Procedures for the Adjudication of Claims*, I caused to be mailed postage prepaid a total of 5,135 postcard notices, in substantially the same form as Exhibit "C" to the Receiver's *Petition No. 39*, to each person at the last known address appearing in the Claims Database. A total of 782 of these postcard notices were returned as undeliverable.

Where a forwarding address was provided on the returned postcard, another postcard notice was mailed to the forwarding address provided.

4. Each of the claims received has been reviewed. In cases where the identity of the claimant and the amount claimed is supported by the receivership records, the claim has been recommended for approval in the amount claimed. Where the claim does not agree with the receivership records and was not otherwise supported by documents, the claim has been recommended for denial or for approval for a lesser amount consistent with the receivership records. At the direction of the Receiver I have prepared a schedule of the claims received and the Receiver's recommendations, which is being filed with the Receivership Court as part of the Receiver's *Claims Report*.

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

Executed this 15 day of August, 2011


Ken Reed