

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

***D.G. Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211
Spoliation-notice@mailbox.org***

July 19, 2019

Jason Goodman, CEO
Multimedia Systems Design, Inc.
252 7th Avenue
Suite 6-S
New York, NY 10001

Clerk of the Court, Room 3000
U.S. District Court
701 E. Broad St.
Richmond, VA 23219

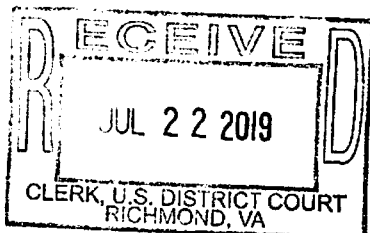
**MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL
District Judge M. Hannah Lauck**

**SUBJECT: PART FOUR: ATTEMPTED FRAUD ON THE COURT BY
DEFENDANT GOODMAN VIA ECF DOC. NO. 139**

REF: (a) MANUEL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834

Good Morning:

1. This letter addresses the false misrepresentations that you continue to present to this honorable Court based on insufficient tainted evidence that has been created with the cooperation of your CrowdSource The Truth (CSTT) side kick, see ref: (a), known as "DEFANGO".



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2. Your attention is kindly directed to ECF Doc. No. 139, para. 22, shown below.

1
2 22. Additionally, Chavez provided communications between Plaintiff, Chavez, Thomas
13 Shoenberger and Tanya Cornwell the wife of counsel for Plaintiff, Steven Biss.
14 (EXHIBIT E) This email provides evidence that counsel for Plaintiff Biss is using his
15 wife as a “cutout” or conduit through which he can indirectly communicate with the co-
16 conspirators and still provide the plausible claim that “I haven’t spoken with (fill in the
17 name)”. This email provides substantial evidence of the conspiracy alleged by
18 Defendant. A transcript of a publicly broadcast multiparty phone conversation between
19 Simpsons, Chavez, Intervenor Applicant and others has been submitted as evidence
20
21 previously in this matter (ECF No. 78 EXHIBIT A).

3. It is instructive to note that in ECF Doc. No. 78, a transcript of the above cited video is provided as **EXHIBIT A** (listed as “1” in ECF). The video content transcribed into EXHIBIT A (ECF Doc. no. 78) is taken from the following BITCHUTE.COM Internet web platform (see below).

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CRAZY DAVE
CRAZY_DAVE
7 subscribers

Subscribe

VIDEOS ABOUT



Mar 24, 2019

Has David George Sweigert "Gone Postal"?

Originally titled "LARP HQ Follow the women George Webb and Jason CrowdsSource" why did David George Sweigert delete this video only minutes after uploading it? Did he realize he'd revealed too much? Is he trying to figure out if Jason Goodman of CrowdsSource the Truth really has engaged the U.S. Postal Inspector in the alleged case of mail fraud?



Mar 06, 2019

The amazing magical Post Office

David Sweigert at the Mesa AZ post office on December 1, 2108 where he was added to PO Box 152 officially with the assistance and full knowledge of the PO Box owner. This was done to cover up his false statements in court documents related to federal civil action he has brought against Jason Goodman. These false statements were submitted to USDC SDNY claiming PO Box 152 Mesa AZ was his true and accurate legal mailing address During



Oct 09, 2018

FUSION CENTER ALERT GEORGE WEBB TERROR CELL PPD-8 NIPP

This is a message that David Sweigert aka Dave Acton posted approximately October 17, 2017 to a network of cyber operatives. In this video, Sweigert directs these operatives to monitor all activity of journalist Jason Goodman of CrowdsSource the Truth as part of a distributed targeting and harassment campaign



Oct 09, 2018

Frank Bacon Offers to Get Dave "Acton" Sweigert Paid By Steemit.com to Harass Jason Goodman

Nathan Stolpman (aka LTV), Manuel Chavez III (aka Defango), Tyrone Simpson (aka Frank Bacon), David George Sweigert (aka Dave Acton) discuss using government processes, military processes and law enforcement processes in combination with the steemit.com blockchain social media network in an organized, monetized attack on Jason Goodman.

MOST VIEWED



Frank Bacon Offers to Get Dave "Acton" Sweigert Paid By Steemit.com to Harass Jason Goodman

8 months, 3 weeks ago



Trigger Warning Cyber Militia Forming -George Webb Advised

10 months, 2 weeks ago



ADULT CONTENT NSFW Jason Goodman calls George Webb crazy - Intel Valor advised

10 months, 2 weeks ago



4. The BITCHUTE.COM web-site address provided by you points to the video depicted below:

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**FRANK BACON OFFERS TO GET DAVE "ACTON" SWEIGERT PAID BY STEEMIT.COM TO HARASS
JASON GOODMAN**

WATCH

5. The video described in EXHIBIT A (ECF Doc. No. 78) is posted to a web-site channel known as “CRAZY_DAVE”. You have acknowledged on many occasions, in other litigation, that you operate, maintain, process and store information on the BITCHUTE.COM “CRAZY_DAVE” channel.

6. As you have admitted in other litigation, you have no permission to use the video content of the undersigned, nor his likeness, portrait, photograph, etc. The video content posted to the BITCHUTE.COM “CRAZY_DAVE” smear channel has been used without any permission of the video creator. The likeness, photograph and/or portrait of the undersigned is also used without permission. This “CRAZY_DAVE” is operated by you for your purposes and includes the use of unauthorized copyrighted materials.

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7. The video description (presumably written by you) states:

CRAZY_DAVE

7 Subscribers Subscribe

Nathan Stolpman (aka LTV), Manuel Chavez III (aka Defango), Tyrone Simpson (aka Frank Bacon), David George Sweigert (aka Dave Acton) discuss using government processes, military processes and law enforcement processes in combination with the steemit.com blockchain social media network in an organized, monetized attack on Jason Goodman.

Internet URL: <https://www.bitchute.com/video/Ez5xgxUk8daU/>

8. The video caption cited above seems to encapsulate the allegations you have provided on page 3 of 17, ECF Doc. No. 78 and in para. 22 of ECF Doc. No. 139. However, as you have stated, you have no date for when this recording was posted, distributed, or made public, “[o]n or around December 2017, in a multiparty video chat (EXHIBIT A)...”. You may be interested in some of the transcribed audio (see below).

VOICE: 01:30 Let’s talk about how to take the audience up to the next level. And the next thing and all this. Help as many people as I can for the Christmas time for the show. I would be willing to buy anyone an account on Steemit so they can direct message me on the Hoax Wars channel, that includes you Dave.

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9. I wish to confirm with you, that you believe this language from “VOICE” is NOT about paying for Steemit accounts to be provided as presents during the Christmas season; but, represents an inducement to join “the organization of the monetized conspiracy”. You wrote the headline to the video content, which states:

**FRANK BACON OFFERS TO GET DAVE "ACTON" SWEIGERT PAID BY
STEEMIT.COM TO HARASS JASON GOODMAN**

10. The transcribed audio of the undersigned indicates as follows:

VOICE: 01:53. If you look at a unified effort, I got a lot of training from the government, and all the rest of this stuff because I was in the military at a young age. It is a unified effort and ever one has lanes. What’s happening is people are getting into each other’s lanes. And I told everybody on DEFANGO’s show, like two weeks ago, I am the government liaison. I don’t want to do anything else. If .. and LTV will tell you, if you need a nasty letter written, Dave’s your guy. “

VOICE: 02:20. What do layers do? What do lawyers do, what do Congressmen do? Garble. Garble. I volunteer to be the liaison to f_ck with these guys, Government processes, military processes, law enforcement processes .. that’s how I am f_cking .. garble .. with George.

VOICE: 02:37. As a contribution ... garble .. garble .. You can write that into a blockchain and you, you would have an amazing platform, my friend.

11. To be honest, this area of the video that you consistently rely on as proof of the “monetized harassment campaign” is very garbles and almost unintelligible. Further, as you can plainly hear, the focus of the remarks was directed at George Webb (Sweigert) and not you.

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12. Below is presented the same section of transcribed dialogue provided by your “speech processor” in EXHIBIT A of ECF Doc. No. 78. Please note the errors (see red arrows).

17	00:02:00,149 --> 00:02:03,329	
	lanes and what's happening is people are	
18	55	
	00:02:01,799 --> 00:02:05,159	
19	getting in each other's lanes and I told	
	56	
20	00:02:03,329 --> 00:02:07,409	
21	I told everybody on the fan go show like	←
	57	
22	00:02:05,159 --> 00:02:09,119	
	two weeks ago I'm the government liaison	
23	58	
24	00:02:07,409 --> 00:02:11,670	
	I don't want to do anything else if you	
25	59	
26	00:02:09,119 --> 00:02:13,140	←
	need a stand and LTV will tell you if	
27	60	
	00:02:11,670 --> 00:02:14,940	
28	you need a nasty letter	
	61	

DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE EXHIBIT A - 4

13. The undersigned wishes to confirm with you, that you believe the above cited commentary represents involvement with “the organization of the monetized conspiracy.” Based on the description you wrote for the video, you believe that this language (cited above) represents a discussion about “using government processes, military processes and law enforcement processes...” to somehow attack you – and not George Webb (Sweigert).

14. The undersigned kindly requests that you demonstrate how you procured the electronic stored information (ESI) in the form of the BITCHUTE.COM video content. Please describe each stage of the process you have relied upon to capture, store and protect such video content. Please also guarantee the authenticity of the ESI based upon the description of the steps used to capture, store, re-post and upload said video content. Your attention is directed to **Rules 104 and 901 of the Federal Rules of Evidence (F.R.E.)**. To help you understand the role of F.R.E. Rule 901 please note: “The burden to authenticate under Rule 901 is not high-only a prima facie showing is required. See *United States v. Caldwell*, 776 F.2d 989, 1002 (11th Cir.1985) (“Once that prima facie showing has been made, the evidence should be admitted, although it remains for the trier of fact to appraise whether the proffered evidence is in fact what it purports to be.”); *United States v. Goichman*, 547 F.2d 778, 784 (3d Cir.1976)” [*U.S. v. Williams*, 946 F.2d 888 (4th Cir. 1991)]. You have not met this burden.

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15. Other offensive and slanderous video content that you have created on BitChute.Com featuring the undersigned includes the following:

<p>Posted Oct. 9, 2018</p>	<p>FUSION CENTER ALERT GEORGE WEBB TERROR CELL PPD-8 NIPP</p> <p>This is a message that David Sweigert aka Dave Acton posted approximately October 17, 2017 to a network of cyber operatives. In this video, Sweigert directs these operatives to monitor all activity of journalist Jason Goodman of Crowdsourc the Truth as part of a distributed targeting and harassment campaign</p>
<p>Posted March 24, 2019</p>	<p>Has David George Sweigert "Gone Postal"?</p> <p>David Sweigert at the Mesa AZ post office on December 1, 2108 where he was added to PO Box 152 officially with the assistance and full knowledge of the PO Box owner. This was done to cover up his false statements in court documents related to federal civil action he has brought against Jason Goodman. These false statements were submitted to USDC SDNY claiming PO Box 152 Mesa AZ was his true and accurate legal mailing address During October and November of 2018. This video and his mailing of a US Postal money order in the amount of \$1 is an attempt to cover up his violation of 18 U.S. Code § 1001, a statue General Michael Flynn currently faces potential jail time for allegedly violating. Violation of this statue is a felony and carries a maximum penalty of 5 years in prison. Sweigert has removed this video recording from his YouTube channel in an ongoing effort to spoliare evidence of crimes he has committed in an attempt to further false claims and defamatory accusations against Jason Goodman and Crowdsourc the Truth.</p> <p>[emphasis added]</p>

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16. There are well over fifty (50) other titles posted by you concerning the undersigned. Of particular interest is your explanation of the infamous Black Cube rumor, which has been addressed in PART ONE, letter dated July 11, 2019, which is ECF Doc. No. 145. That letter is hereby incorporated as if fully re-stated herein.

17. As ECF Doc. No. 145 clearly explains, the undersigned has NOTHING to do with the promulgation of the Black Cube rumor. Below is your posting on BitChute of video content which is the property of the undersigned, which you have posted in an unauthorized manner (see below).

Posted August 28 th , 2018	<p>SET THE RECORD STRAIGHT WITH JASON GOODMAN AND GEORGE WEBB</p> <p>Dave continues to lay out aspects of his plan yet to come including threats of future litigation. He does all this while re-referencing a video in which his brother George Webb Sweigert directs people to watch a video in which Dave accuses Jason Goodman of working for Mossad off shoot Black Cube. Despite his self proclaimed contract work for DHS and other agencies, Dave denies affiliation with the so called "deep state" while feigning ignorance of Manuel Chavez, the very person Dave speaks with in the video referenced by George.</p> <p>[emphasis added]</p>
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18. Further, your allegations that individuals have alleged that you are an operative of “Black Cube”, “Israeli intelligence” or the “Mossad” should be viewed in the shadow of your very public close association with individuals that proclaim connections with top Israeli government officials; to include Jerome Corsi and Larry Klayman, esq. To refresh your memory both of these men appear on the Southern Poverty Law Center “Watch List” for hate speech.

19. In the case of Mr. Klayman, he has provided evidence and testimony to a federal court that he is in active contact with government officials of Israel. See *Montgomery v. Comey*, U.S.D.C. for the D.D.C., Civil Action No. 17-1074 (RJL), (D.D.C. Mar. 1, 2018). See excerpt of ORDER from the Hon. Richard J. Leon (see below).

Preliminary Injunction, or their supporting affidavits—that they communicate with any persons abroad, let alone that they have reason to believe that their foreign contacts have been targeted under the PRISM program. Plaintiffs’ allegations here are therefore *even less* colorable than those I dismissed for lack of standing under *Clapper* in *Klayman I* and *Klayman II*. See *Klayman*, 2017 WL 563668, at *13 (holding that Klayman failed to establish standing to challenge the PRISM program, even where he alleged that he “frequents and routinely telephones and e-mails individuals and high-ranking government officials in Israel” and communicates with persons in several other nations). Plaintiffs accordingly lack standing to challenge defendants’ alleged surveillance under the PRISM program.

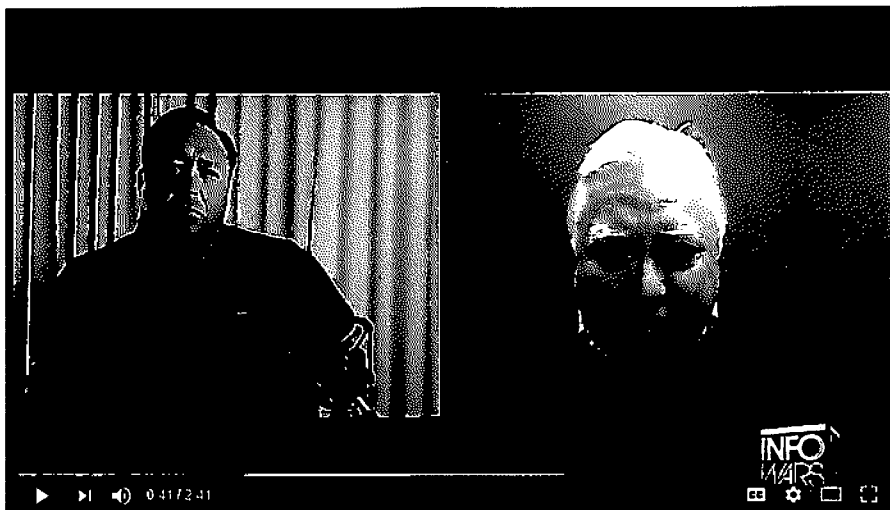


Second, plaintiffs claim that they, and millions of other Americans, have been targeted for surveillance by the bulk telephony metadata collection program formerly conducted by the NSA pursuant to Section 215 of the USA PATRIOT Act.

20. As you are well aware, Jerome Corsi appeared on the Alex Jones INFOWARS social media podcast and advised the host that he was receiving communications “higher than Mossad”. See the video entitled, “Alex Jones Deemed Kosher by “Top Israeli Intelligence””, Aug. 27, 2017 (see below).

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Alex Jones Deemed Kosher by "Top Israeli Intelligence"



Know More News

✓ Subscribed 104K

+ Add to Share More

4,052 views

👍 99 🗨️ 10

Published on Aug 12, 2017

Internet URL: <https://www.youtube.com/watch?v=jORe0zfEOX0>

00:21 CORSI. Well Alex its great, actually today I am in Nashville, Tennessee working with a really important cyber security company. And I just got a text from top intelligence in Israel.

21. As you are aware, you produced a two-part video series to "indict" Robert Mueller (former special counsel) with a "Citizens Grand Jury with Larry Klayman acting as "special prosecutor". See video entitled, "*Freedom Watch Citizens Grand Jury – Mueller Indictment Part 1 Introduction & Jury Instructions*", dated June 27, 2019.

7.5.
2.18.19

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Freedom Watch Citizens Grand Jury – Mueller Indictment Part 1
Introduction & Jury Instructions

Jason Goodman
✓ Subscribed 62K

4,969 views

+ Add to Share ... More

👍 354 🗨️ 22

Streamed live on Jun 27, 2019

Larry Klayman and his dedicated team at Freedom Watch put together this historic Citizens Grand Jury. With this, the people of the United States take back the power bestowed upon us by the founding fathers of this nation. If the Justice Department will not, citizens must hold Robert Mueller accountable for his gross constitutional violations.

L to R: Larry Klayman and Jason Goodman

Streamed live on Jun 27, 2019

Larry Klayman and his dedicated team at Freedom Watch put together this historic Citizens Grand Jury. With this, the people of the United States take back the power bestowed upon us by the founding fathers of this nation. If the Justice Department will not, citizens must hold Robert Mueller accountable for his gross constitutional violations.

Internet URL: https://www.youtube.com/watch?v=Mce9QhkNj_M&t=12s

22. As you are well aware, the second part of this widely distributed video content is entitled, “Freedom Watch Citizens Grand Jury – Mueller Indictment Part 2 Dr. Jerome Corsi's Witness Testimony”, dated June 27, 2019.

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Freedom Watch Citizens Grand Jury – Mueller Indictment Part 2 Dr.
Jerome Corsi's Witness Testimony



Jason Goodman

✓ Subscribed 82K

11,280 views

+ Add to Share More

630 36

L to R: Larry Klayman, Jerome Corsi [on monitor], Jason Goodman

Streamed live on Jun 27, 2019

Part 2 of Freedom Watch's historic Citizens Grand Jury proceedings includes testimony from Dr. Jerome Corsi. Dr. Corsi was targeted by Mueller's investigation and subjected to rigorous interrogation as well as subsequent reputation and financial destruction.

Internet URL: <https://www.youtube.com/watch?v=9vWce9xTOCU&t=4147s>

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23. Your attention is kindly directed to ECF Doc. No. 139, para 39, show below:

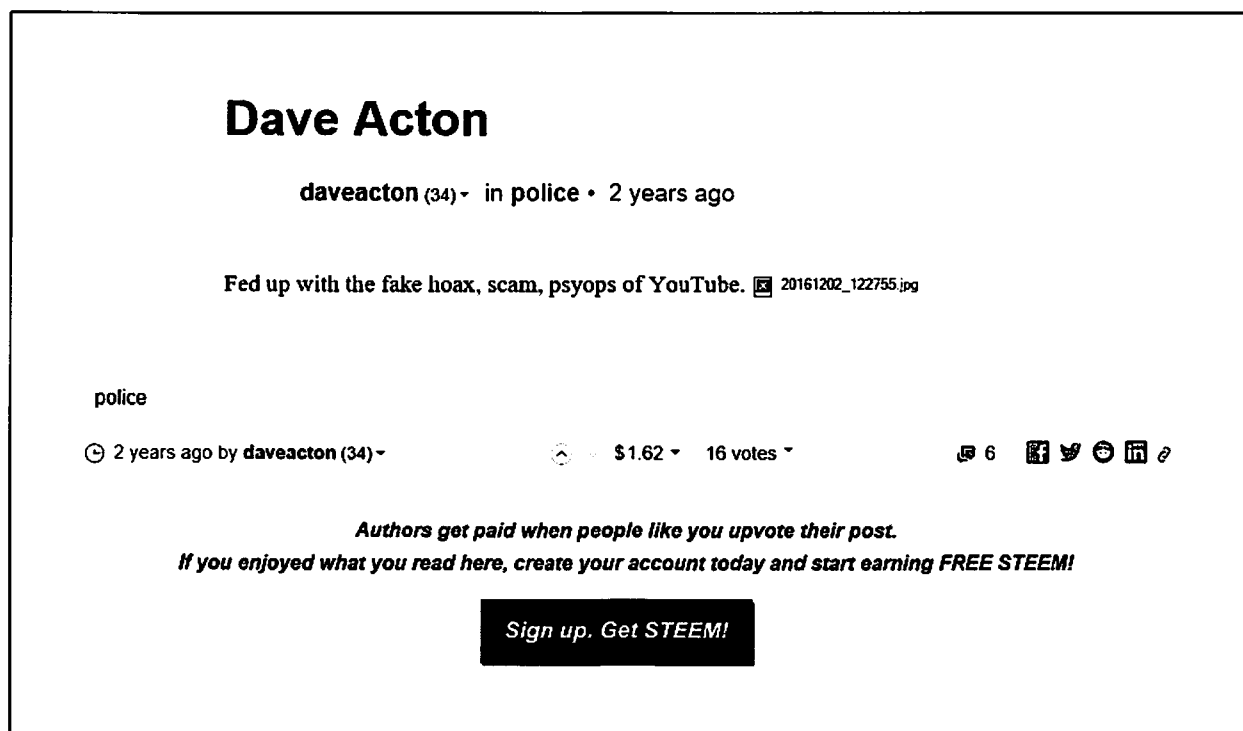
39. On July 7, 2017 Plaintiff sent an email communication to George Webb Sweigert, brother of Intervenor Applicant, stating "A massive law suit is about to be filed against Jason Goodman by a lawyer who specializes in defamation cases. Manny is the one who will be in front" (EXHIBIT J) Manny is Manuel Chavez III, one of the individuals who was on the multiparty video chat in which Sweigert agreed to a monetized harassment effort targeting Defendant as presented here in previous pleadings. This email was sent just three weeks after Tanya Cornwell sent the above referenced email to Manuel Chavez III encouraging him to sue Defendant Goodman. It is conceivable that Plaintiff intended to use Chavez as a "cut out" to bring the same type of legal action against Defendant Goodman, subjecting Goodman the the same legal jeopardy and assumed need to hire counsel and subsequent financial ruin, without subjecting himself to the risk of fines for legal fees or other sanctions. It now seems Chavez' sense of self-preservation prevented him from complying with this plan and may have led to the break in the relationship, and dissention in the ranks of the conspirators.

24. You have not provided enough evidence to support your allegations about a "monetized harassment effort". For your information, the undersigned has NEVER received any money or compensation from "STEEMIT" or related blockchain technologies. The undersigned has NOT participated in a monetized blockchain organization to slander you. Such an allegation is STRONGLY DENIED.

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25. Please note from the below screen-shot, that the “Dave Acton” STEEMIT account has been inactive for almost two years. The account showed little activity immediately after it was commissioned around Christmas, 2017. This account was more or less a test prototype account that received a few days of access from the undersigned. The STEEMIT account was abandoned by the undersigned shortly after initiation (approximately January 2018).



Internet URL: <https://steemit.com/police/@daveacton/dave-acton>

26. Apparently, there is \$3.39 monetary amount in a STEEMIT account linked to me. The undersigned has never taken, or received, any of these monies from the STEEMIT platform. Your assertions about the undersigned participating in a monetized defamation organization are meritless, unfounded, frivolous and submitted to this Court for the purpose of committing a fraud upon the Court.

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27. Your attention is directed at the below cite from *U.S. v. Larry Recio*, 17-4005, U.S. Court of Appeals, Fourth Circuit.

A proponent of evidence must “produce evidence sufficient to support a finding that the item is what the proponent claims it is.” Fed. R. Evid. 901(a). However, “the burden to authenticate under Rule 901 is not high.” *United States v. Hassan*, 742 F.3d 104, 133 (4th Cir. 2014) (internal quotation marks and citation omitted). The district court must merely conclude that “the jury *could* reasonably find that the evidence is authentic,” not that the jury necessarily *would* so find. *See id.* (internal quotation marks and citation omitted) (emphasis added).

Internet URL: <http://www.ca4.uscourts.gov/opinions/174005.P.pdf>

28. You have not met the burden for the presentation of this so-called evidence to the Court for its consideration.

29. Your allegations that somehow the undersigned worked with, worked for, conspired with or had conspiratorial planning with ref: (a), the Plaintiff, or the co-defendant or any of their associates is false, devoid of truth, unfounded, meritless and unsupported by any of your tainted and unauthenticated evidence.

30. It appears you have attempted to commit a fraud upon the Court by pushing fraudulent narratives with non-admissible “evidence”.

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I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 19
day of July 2019.

D. Swigert

**D. G. SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**

Copy provided:

Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525

7.19.19

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROBERT DAVID STEELE,

Plaintiff,

-against-

JASON GOODMAN,

Defendant.

17-CV-00601-MHL

CERTIFICATE OF SERVICE

It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Clerk of the Court
U.S. District Court
701 E. Broad St.
Richmond, VA 23219**

**Jason Goodman
252 7th Avenue
Suite 6-S
New York, NY 10001**

**Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 17 day of July, 2019.



**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**

7.18.19