

EXHIBIT A

4. The transaction was a \$30,000.00 wire transfer from Ms. Presson's bank account for the purchase of 30 1-ounce miscellaneous gold bars (the "Gold Bars"). The cost of the gold bars was to be \$29,170.00 and the remaining \$830.00 from the transferred funds was to be returned to Ms. Presson. The Sales Order Number is S5517.

5. Pursuant to the Order Confirmation, the 30 1-ounce miscellaneous gold bars were to be shipped to Ms. Presson on or around February 16, 2009 or February 17, 2009.

6. Less than a week after the order for the Gold Bars was placed, I was advised that Stanford International Bank, Inc. was put into a Receivership, which included SCB.

7. On or around April 22, 2009, I submitted a claim on the Stanford Financial Receivership Website regarding the Gold Bars purchased from SCB.

8. For several weeks, I tried to get information regarding the Stanford Receivership. Ultimately, I contacted my Congresswoman, Jo Ann Emerson.

9. Shortly after my contact with Jo Ann Emerson, in early June 2009, I was contacted by Paul Montgomery, who advised me he was employed by the Receiver, Ralph S. Janvey, as a numismatist.

10. During this conversation in early June 2009, Mr. Montgomery advised me that the Receiver was in possession of all the Gold Bars purchased by Ms. Presson and that the Gold Bars were secure. Mr. Montgomery then advised me to call back in 30 days for further update.

11. During the June 2009 conversation, Mr. Montgomery advised me that nothing needed to be done as to the Gold Bars at the current time.

12. At various points, generally monthly thereafter, I would contact Mr. Montgomery and would be told to call back in another 30 days for an update.

13. During these routine status update calls, I was never told that the Gold Bars ordered were not in possession of the Receiver, and that a Joint Motion of the Receiver and

the Examiner Regarding Coin and Bullion Claims and Assets (the "Joint Motion") was filed which would treat Ms. Presson's claims a general creditor.

14. In early September 2009, I again called for a status update and was told by Mr. Montgomery that the Gold Bars ordered by Ms. Presson were not in the possession of the Receiver, in direct contradiction to what I was told in early June 2009. For the first time, I was also advised by Mr. Montgomery to seek legal counsel.

15. As soon as I realized it was necessary, I contacted Sean J. McCaffity, of Rochelle McCullough, LLP to act as my legal counsel in this matter.


16. Based on my conversations with Paul Montgomery, until early September 2009, I believed the Receiver was in possession of the Gold Bars ordered by Ms. Presson.

17. Neither myself nor Ms. Presson were served with a copy or notified about the Joint Motion, although a claim had been submitted regarding the Gold Bars purchased by Ms. Presson in April 2009.

18. If either myself or Ms. Presson has been served a copy of the Joint Motion, a response would have been timely filed on Ms. Presson's behalf.

I declare under penalty of perjury and in accordance with 28 U.S.C. § 1746 that the foregoing is true and correct.

SIGNED this 18 day of September, 2009.


LUCAS PRESSON