

EXHIBIT A

1 Matthew R. Lewis (Nevada Bar #12432)
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6 *Attorneys for Nonparties Todd Vowell, et al.*
7

8 UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF NEVADA

10 FEDERAL TRADE COMMISSION, (

11 Plaintiff, (

12 v. (

13 JEREMY JOHNSON, et al. (

14 Defendants. (

CV 10-2203-MMD-VCF

15
16 **DECLARATION OF MATTHEW R. LEWIS**

17 I, Matthew R. Lewis, hereby state as follows:

18 1. I am a resident of Salt Lake County, Utah and am more than 21 years of age.

19 2. I have personal knowledge of the matters set forth herein, and if called upon to
20 testify, I could and would competently do so.
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1 3. I am an attorney licensed to practice law in Utah and Nevada. I am employed
2 with the law firm of Ray, Quinney & Nebeker P.C. in Salt Lake City, Utah, who is counsel for
3 the Non-party Vowell Entities.¹

4 4. On March 9, 2011, the FTC served Todd Vowell and certain other Vowell
5 Entities with third-party document subpoenas.

6 5. To comply with the subpoenas, the Vowell Entities spent tens of thousands of
7 dollars to collect, produce, and review documents responsive to the subpoenas.

8 6. In total, the Vowell Entities produced more than 5,000 documents.

9 7. Mr. Vowell also agreed to be deposed. The deposition was set for July 22, 2011.

10 8. The day before the scheduled deposition, FBI agents conducting an ongoing
11 investigation into conduct related to online poker websites served Mr. Vowell with a grand jury
12 subpoena.

13 9. I was subsequently informed that Mr. Vowell could not be ruled out as a potential
14 subject or target in that investigation.

15 10. Accordingly, I informed the Receiver that if the deposition continued, Mr. Vowell
16 would assert his right against self-incrimination, as allowed by the Fifth Amendment of the
17 United States Constitution.

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19 ¹ These Entities include Todd Vowell, Sheree Vowell, Alpha Yankee, LLC, C2 Holdings, LLC, Capital Energy
20 Corporation, Cerberus Management, LLC, Choker Block, LLC, Commerce Financial, LLC, , Digital Currency,
21 LLC, Dreamland Capital, LLC, ePayment Solutions, LLC, Executive Service Center, LLC, Fishhook Partners, LLC,
22 Flatline Investments, LP, Flying High Enterprises, LLC, IC Development, LLC, Interstate Lending, LLC, KATTS,
23 LLC, Kingfish Management, LLC, Kombi Capital, LP, Liahona Holdings, L.P., Market Mastery Trading, LLC,
24 Mastery Merchant, LLC, Money Master for Life, Omaha Eight, LLC, Online Weight Loss, Paradise Ranch
Development, LLC, Paydirt Capital, Inc., Paydirt Management, Inc., Paydirt Properties, LLC, Paydirt, LP, Powder
Monkeys, LLC, Scud Runner, LLC, Silvernix Holdings, LLC, Spindletop Investments, LLC, SRLA Association,
LLC, SRLA, LLC, Summerset Ranch, LLC, Taggart Management, LLC, TJJ Properties, LLC, TLV Enterprises,
Inc., Treadstone Partners, LP, Triple Play Group, LLC, Triple Seven, LLC/LP, Triple Seven, Inc., T. Vowell Sole
Proprietorship Capital Holding, Woodsvew Holdings, LLC

