

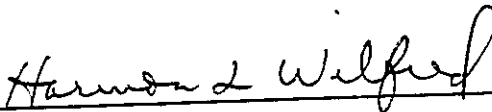
AFFIDAVIT OF HARMON L. WILFRED

This is the sworn affidavit of Harmon L. Wilfred, age 50, with respect to my legal consultations with the law offices of John B. Ciccolella, P.C. during the second week of February, 1997. I had two conversations with Mr. Ciccolella's office. The first conversation included Mr. Ciccolella and his Paralegal name Janet. The second conversation was exclusively with Janet. In these consultations we discussed in considerable detail my custody case and divorce judgement involving my ex-wife, Sandra Wilfred, as well as the difficulties with my then current marriage with Dearna Wilfred involving her abusive behaviour towards our two children. After our initial conversation, Mr. Ciccolella recommended that I provide his Paralegal with further details regarding both the previous and current family issues, and upon his review, he would have Janet contact me with his proposal for legal representation. The conversations included consultation with regard to family law, including but not limited to divorce, custody, property and civil rights issues involving the judgement in my then previous marriage with Sandra Wilfred.

During these conversations I also requested an evaluation of the case for strength of position as well as projected legal expenses. I received a call back from the Paralegal informing me that Mr. Ciccolella had reviewed the information and agreed to take the case upon his receiving a retainer of \$5,000. I informed her that I did not have the \$5,000.

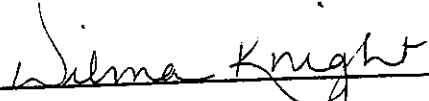
I was recommended to Mr. Ciccolella by my business associate, Collin Finn, and his girlfriend Kathryn Large. Kathryn had previously utilised his services for obtaining custody of her daughter. Mr. Finn was present during at least one of my conversations with Mr. Ciccolella's office and I reported the content of all conversations to both Mr. Finn and Ms. Large as they occurred, including Mr. Ciccolella's offer to represent me. As they were directly aware of Dearna's abusive behaviour towards our two children, they were both quite disappointed when they found out that Mr. Ciccolella would not compromise on his retainer.

Further Affiant sayeth naught.



Harmon L. Wilfred

Subscribed and sworn to before me this 24th day of September, 1999 by Harmon L. Wilfred in the City of Stratford, Province of Ontario, Canada



WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

AFFIDAVIT OF COLLIN M. FINN

This is the sworn affidavit of Collin M. Finn, age 50, with respect to my witness to and discussions with Harmon L. Wilfred regarding Mr. Wilfred's legal consultations with the law offices of John B. Ciccolella, P.C., during the second week of February, 1997.

Mr. Wilfred has been a business associate of mine through our common interests and activities in the real estate business since 1993. During the first part of February, 1997, my girlfriend, Kathryn Large and I recommended the law offices of John Ciccolella to Mr. Wilfred to help him with his personal difficulties involving the custody of his son in his previous marriage as well as his current difficulties in his existing marriage. Kathryn had previously utilized Mr. Ciccolella's services for obtaining custody of her daughter.

I was present with Mr. Wilfred during the first conversation with Mr. Ciccolella's office, which included Mr. Ciccolella and his paralegal named Janet. I overheard Mr. Wilfred discuss his previous custody case and divorce judgment involving his ex-wife, Sandra Wilfred as well as his difficulties with his then current marriage with Dearnna Wilfred with respect to her abusive behavior toward their two children. During this conversation, Mr. Ciccolella recommended that Mr. Wilfred provide his paralegal, Janet, with detailed information, and upon his review, he would have Janet contact Mr. Wilfred with his proposal for legal representation. During this initial conversation, Mr. Wilfred received advice regarding his previous marriage with Sandra Wilfred, as well as advice on his current situation involving the abuse of his children and possible divorce action involving Dearnna Wilfred.

Within a couple of days after Mr. Wilfred's initial consultation referenced above, Mr. Wilfred reported back to me that after a second conversation with Mr. Ciccolella's paralegal, she had called back to inform him that the case information had been reviewed with Mr. Ciccolella and that he was willing to proceed with a retainer required of \$5,000. Mr. Wilfred told me that he did not have the \$5,000 and, therefore, could not satisfy this requirement.

Out of concern for Mr. Wilfred's children, I continued to follow the situation until he hired an attorney named Seymour Wheelock.

Further Affiant sayeth naught.

Date: 10/8/99


Collin M. Finn

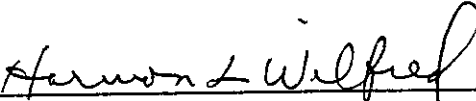
AFFIDAVIT OF HARMON L. WILFRED

- 1) This is the sworn affidavit of Harmon L. Wilfred, age 50, with respect to the marriage and the events since my marriage to Dearna Garcia Wilfred, age 40. We were married on Dec. 11, 1990 and we have two children, Isaac Arthur Wilfred who is now five years old and Danielle Marie Wilfred who is now seven years old. I am formerly employed by Arcore International Funding, L.L.C., (AIF).
- 2) Since the beginning of the marriage Dearna has displayed extremes in behaviour with severe hostility on one end and deep depression on the other, accompanied by uncontrollable bellowing and crying at both extremes. This behaviour was manifested in the last two years of our marriage by violent behaviour towards me and our children including threatening me with kitchen utensils and knives, striking me repeatedly in the face with her fists and kicking me in the shins. All of this behaviour was displayed in the presence of the children even when they were in my arms, leaving them frightened and sometimes despondent and detached.
- 3) Dearna had very specific, unreasonable rules as to how the children should play with their toys. If they did not respond precisely to her wishes, she immediately threw the toys in the trash. On one occasion, Dearna became so enraged over people calling the house as she described as "too often" or those she did not approve of, including my business partners, that she ripped the answering machine off the wall and threw it against the wall. She also had an unrelenting fetish over cleanliness of the children's clothing to the extent that she would spend nearly all of her time washing and spotting clothing daily. Should either child get their clothing soiled she would verbally berate them for hours, sometimes for days after the event. If she could not get the stain out entirely, she would throw the clothing away and replace it with new clothing
- 4) In 1997, Dearna began to physically abuse the children beyond the previous emotional abuse with physical bouts of punishment including hitting and severe spankings. Once, she threw our daughter against a door in our home so hard that she drove the door knob into the wall. I contacted attorney Seymour Wheelock for help and he recommended that I contact Social Services. I filed a report with the El Paso County Social Services during April, 1997.
- 5) Mr. Wheelock agreed to help me and at the same time Dearna asked me if she could spend some time away from the children and the house in order to get some rest and regain her self control. She said that her behaviour toward the children was due to her physical and emotional exhaustion. Before she left, Dearna and I interviewed, agreed upon and hired a nanny, Mrs. Janet Reinhard, to assist me in caring for the children. After she left, I was advised by Mr. Wheelock to not permit Dearna to re-enter the home without certain agreements and understandings as to her behaviour toward the children. According to Mr. Wheelock, he obtained permission from El Paso County Department of Social Services to work out a private solution and to monitor the situation. As a part of the private solution, Dearna agreed to obtain professional counselling and to have Mrs. Reinhard in the home to assist her with, and monitor her behaviour toward the children. This agreement took place at Mr. Wheelock's office in the presence of his wife, Ms. Jenene Kelley, M.S.W. a child care specialist. We agreed that if the children were abused again by Dearna, that Dearna would leave the home and her contact with the children would be monitored by Social Services. With this agreement in place, Dearna returned home. When she began living with us again, Dearna began to insist that she was fine and that she did not need counselling.

- 6) In June, 1997 I left Colorado on a business trip which I expected would last approximately one month. Under our agreement Dearna knew that the nanny was to stay with her and the children from 8:00 AM to 6:00 PM daily for their protection. While on my trip, which was extended, I spoke with Mrs. Reinhard regularly. In early August, 1997 while I was in Canada, Dearna fired Ms. Reinhard without telling me. During my evening calls to her and the children, Dearna was verbally hostile towards me and physically abusive toward the children, i.e., by spanking them on their bare skin as I listened. She repeatedly threatened me and said (in the presence of the children) that she was tired of dealing with the children on her own and that if I did not come home immediately or make other arrangements for the children, that I might not see them again. I could hear the children crying uncontrollably in the background during my calls. Dearna would often refuse to let me speak to the children or hang up the phone while we were speaking. This was more than I could bear. I called Seymour Wheelock and asked him to prepare the divorce papers. I believed then, and I believe now that my children are at risk with their mother.
- 7) My partner in AIF is Mr. Don Gillmore who lives in Ottawa, Ontario, Canada. Our business required me to visit California and Arizona, however, before I left, I arranged through Mr. Gillmore for a residence in Canada for me and the children to stay, once I received custody through the divorce.
- 8) I spoke to Dearna before traveling to Arizona. She insisted on meeting me there to give her a "break" from the children. Dearna was aware that my sister lives in Phoenix and expected that I would ask for her to baby-sit during my business meetings. I reported all of this to Mr. Wheelock, who was ready to file. He suggested that Dearna be served with the divorce papers in Arizona. This made me nervous, however, he offered to come to Arizona and personally take care of the procedure. I asked if I would be able to keep the children after Dearna delivered them to me. Mr. Wheelock explained that because Dearna was taking Danielle and Isaac out of Colorado before service of the divorce papers, I would be able to legally "rescue" and have custody of the children in order to keep them from further abuse. Mr. Wheelock had spoken to several witnesses who were willing to describe Dearna's mistreatment of the children.
- 9) I arrived in Scottsdale, Arizona on October 8, 1999 and reserved a hotel room for Dearna who arrived on October 10, 1999 with the children and her parents. I greeted them at the hotel upon their arrival and was told by Dearna, "get these kids away from me". I took the children to my hotel.
- 10) From October 10, through October 14, 1997 Mr. Wheelock's wife, Jenene Kelley, who accompanied him on the trip to Scottsdale, remained with me to help with the children, because they were displaying many signs of having been abused by their mother. Mr. Gillmore helped by finding money to purchase airline tickets for the children to return with me to Canada. After Ms. Kelley and Mr. Wheelock observed and spoke to the children, Mr. Wheelock stated that the evidence, documentation and witnesses of Dearna's abuse was so strong that no judge would ever give her custody of the children. Mr. Wheelock stayed in Scottsdale to talk to Dearna and her father, Mr. Earl Garcia, about the divorce; He returned to Colorado Springs October 14, 1997 to further handle the case.
- 11) On the evening of October 15, 1997, the night before we returned to Canada, I received a call from Mr. Wheelock informing me that Dearna had hired an attorney, John Ciccolella, who had scheduled an emergency hearing for October 17, 1997. I told him that I didn't believe it was possible for me to attend the hearing on such short notice. He then said he would attend the hearing and present the witnesses and documentation of Dearna's abusive behavior to the Court.

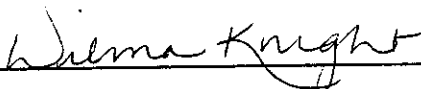
- 12) On October 25, 1997 I spoke with Mr. Phillip Freytag, a friend of the family who had been contacted by Dearna and asked to intervene as a go between to explore the possibility of a divorce settlement. On November 22, I received a proposed settlement from Dearna through Mr. Freytag. After prayerful consideration, I agreed with Dearna's proposal. Mr. Freytag put our agreement in writing and delivered it to her for signature. We waited with no reply. Mr. Freytag made several unsuccessful attempts to contact Dearna.
- 13) After the divorce filing and retrieval of the children, Mr. Wheelock made himself unavailable to me for further consultation, even though he continued to be my attorney of record. On February 14, 1998, I was arrested by the Canadian authorities and held for extradition to the United States under criminal charges of violation of a custody order and criminal extortion. The children were taken from me upon my arrest and returned to the same abusive environment from which I had removed them four months earlier. For weeks after my arrest, Mr. Wheelock continued to be unavailable to me. Mr. Gillmore repeatedly phoned and faxed him on my behalf with no reply while I was incarcerated. Mr. Wheelock's next communication was through Mr. Gillmore on March 17, 1998 presenting me with a bill for services rendered.
- 14) I have since been released on bond and am opposing extradition, during which the Canadian Immigration Department has prohibited me from being employed in Canada until this proceeding is concluded (*attached*). I have had no income since my incarceration on February 14, 1998.
- 15) My actions surrounding my separation and divorce from Dearna as described herein were taken out of protective concerns for our children and were taken upon the express advice of Mr. Seymour Wheelock, my attorney. However misguided these actions may be viewed, nothing should divert attention from the safety and welfare of Danielle and Isaac Wilfred.
- 16) I would like to renew communication with the children as soon as possible. They need to see and talk to me, their father, and know that I have not abandoned them and that I deeply love them. I desperately desire to know if they are safe and well as I have not been permitted contact or communication as to their well being or whereabouts for in excess of 19 months. Renewal of my relationship with my children is in their best interests.

Further Affiant sayeth naught.



Harmon L. Wilfred

Subscribed and sworn to before me this 24th day of September, 1999 by Harmon L. Wilfred in the City of Stratford, Province of Ontario, Canada



WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

AFFIDAVIT

The Affiant, Carolyn R. Dare, age forty-seven, being first duly sworn upon oath, deposes and states as follows:

1. I met Harmon Wilfred for the first time on June 6th, 1997, in Guelph, Ontario through his friend and business partner, Donald Gillmore. We became immediate friends and I spent a lot of personal time in the months thereafter with Harmon walking, talking, and getting to know him better. I found him to be a gentle, caring, and compassionate individual, a hard worker, and a good father who was in daily contact with his children while he was on business in Ontario, Canada. He usually was upset during those times as he relayed to me the telephone conversations with his now ex-wife, Dearnna Garcia Wilfred, in regard to Dearnna's abusive treatment of their children at their home in Colorado. Many times during our walks, my speaking with him helped to calm his emotions over what was happening with his children and his immediate plans to stop the abuse legally. He was even forced to listen to Dearnna abuse their children verbally and physically during his daily telephone conversations with her and their children. I actually overheard one of these conversations personally where Dearnna was yelling at the children and audibly slapping them. In another conversation, I overheard Dearnna complaining that Isaac was running around banging his head against the wall and that she could no longer handle him. As an experienced, former, professional childcare worker and mother of two daughters, I was greatly disturbed by these events. My relationship with Harmon grew closer over the next few months. In September, I made a commitment to stand by him and to be his wife whenever his legal divorce proceedings were finalised.
2. In the third week of September, 1997, Harmon and I flew to California as he had some business to conclude there. Shortly thereafter, we drove to Phoenix on business. Harmon also had made previous arrangements to meet Dearnna Wilfred, his lawyer, a social worker, and his children in Scottsdale, Arizona, at Dearnna's insistence. Dearnna had been complaining regularly over the phone that she couldn't handle the children any more. So, through legal counsel, Harmon made arrangements to file for divorce and to rescue his children in Scottsdale. He did so by the planning and direction of his lawyer, Seymour Wheelock. Mr. Wheelock advised Harmon that he now had custody of the children and could legally return to Canada with Danielle and Isaac. Mr. Wheelock and the social worker were present with us in Scottsdale for a number of days to assess the condition of the children and how the children were adjusting. When they were completely satisfied that the children were safe and being well looked after, we flew directly back to Canada to establish residency in a secure family setting. Mr. Wheelock returned to Colorado Springs with the promise of dealing with the divorce proceedings and keeping us informed as to his progress. He also told us that with the evidence observed in Arizona of apparent child abuse by Dearnna Wilfred, there was no way that she would ever be considered for custody of the children without a prior, full psychological evaluation and treatment.
3. Upon our arrival in Stratford, Ontario, the children's behaviour continued to be erratic and insecure. They required a tremendous amount of love and patience to overcome their fears

previously caused by Dearna's abusive treatment. Constant reassurance, hugs and kisses, and getting up in the night to sit with them after a bad dream helped them through this difficult transition. Isaac particularly had difficulty with toilet training, even though he was nearly four-years old. Isaac would hide when he soiled his diapers and when found, would scream and cry when changing him, saying "Please don't rub my face in it (dirty diaper)." He also was afraid to use the toilet. He told me that he was shown wormy "poopoo" in the backyard. He said that his grandparents told him that his "poopoo" also had worms in it and that if he soiled his diaper, the worms would bite his bum. I assured him that that was not true and that it was safe to use the toilet. Over a period of time, his fears were set aside and because of the secure environment and our love, progress was made in leaps and bounds. He became fully toilet trained and very proud of it.

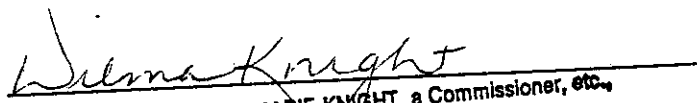
4. Danielle told me that when Dearna would brush her hair, she would cry because Dearna would hurt her and pull her hair. When I cut Danielle's nails with small scissors, she would be very timid and afraid. When I asked her why, she said that Dearna would cut her nails so short that it would hurt her. Danielle would hide under furniture and cry uncontrollably confessing that her mommy Dearna was very mean to her and that she was afraid of her. When home-schooling Danielle, I noticed that she would begin to write with her left hand, then move the pen to her right hand. I asked her what felt more comfortable and she said that she preferred writing with her left hand but that mommy Dearna didn't want her writing with her left hand and would slap her if she did. Because both my children are left-handed, I encouraged her to write with her left hand if that was her preference. Harmon and I made it a point to spend as much time as possible with the children because we knew that they needed constant security and attention, particularly during the early stages of their recovery.
5. Having met the children for the first time, I was amazed at how well they took to me. Danielle even asked to sleep with me rather than Harmon the first night we were all together. Both the children came to me for lots of hugs, kisses, and reassurance and realised the security of my loving relationship with Harmon. My relationship with the children had grown strong and closer over a short period of time. Danielle called me "mom" and Isaac referred to me as "mommy Carolyn". Both of them told me on numerous occasions, totally unsolicited, that they do not wish to see mommy Dearna again as she was mean to them and that they wanted to live with us forever. Isaac told me this more often than did Danielle as Danielle is a little more withdrawn. Danielle also told me that her mommy Dearna doesn't like anyone and gets mad at everyone. One evening at the dinner table, Isaac said to me "If mommy Dearna comes to the house, you better hide in the closet so she can't find you and hurt you." During the four months that they blessed us with their presence, not once did they cry for their mother nor ask for her, nor say they missed their mother. It was quite the opposite. Unsolicited or when asked about their mother, they both said that they never wanted to see mommy Dearna again. Danielle asked about her grandfather because she said he was nice to her, but she referred to her grandmother as mean and Danielle told me that she was "scared" of her. I have come to love both children as my own and feel that it is a blessing to be able to raise these children with Harmon in such a loving environment.

6. After about a month of having the children with us, we engaged my eldest daughter Carla, who was twenty-three, to help us look after them and to be their nanny on a full-time basis. They took to her immediately and felt loving and comfortable with her. She too had experienced bits of the children's past behaviour and saw the improvements over time and how well the children responded to the wonderful care given by Harmon and me. She was particularly impressed with the incredible caring, patient, and loving care Harmon always gave to his children, something she had not experienced from her own father.
7. In January, my youngest daughter Tanya, who was twenty, had just returned from a semester at university. She took over my job of home-schooling Danielle, something I had begun using formal curriculum materials as Danielle was behind her cohorts here in Canada. Danielle enjoyed Tanya's young enthusiasm and was learning at an excellent pace learning how to read, add and subtract, write, create artwork, and work on science projects. She looked forward each day to Tanya working with her. Tanya too witnessed improvements in the children's behaviour and Harmon's excellent loving relationship with them. This situation enabled us to bring together very happily into one family, what previously was two separate families. The relationship between all members became very close and loving.
8. From the time of receiving the children, I have had the opportunity to observe Harmon's fatherly skills with his children and because of the incredible compassionate and loving way he relates to them and their difficulties, I have changed some of my motherly skills to model him. As a mother, I have never experienced seeing a father relate to his children as well as Harmon relates to his and I have respect for him because of this. He is a father who is lovingly devoted to the healing and progress of his children, and I choose to stand by him as a mother because of the love I have for him and his children. We are looking forward to settling down in Stratford, Ontario as a family in close proximity to my parents, the Dare family, who are highly respected in the nearby Kitchener area.

Further Affiant sayeth naught.


Carolyn R. Dare

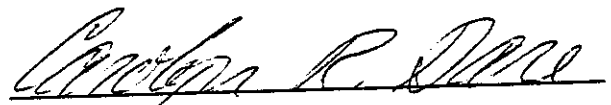
Subscribed and sworn to before me this 15th day of November, 1999, by Carolyn R. Dare in the City of Stratford, Province of Ontario, Canada.


WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

AFFIDAVIT OF CAROLYN R. DARE

- 1) This is the sworn affidavit of Carolyn R. Dare, age 47, with respect to certain events that took place from October 8, 1997 to October 16, 1997 during a trip to Scottsdale, Arizona with Harmon Wilfred.
- 2) On October 8, 1997 I accompanied Harmon Wilfred on a trip from Ontario, Canada to Scottsdale, Arizona. Harmon told me that he was to meet with his attorney, Mr. Seymour Wheelock and Mr. Wheelock's wife, Ms. Jenene Kelley, a Colorado Social Worker, in Scottsdale to receive legal advise and counsel on carrying out the process service of divorce papers on Harmon's then wife, Dearnna Wilfred, and then obtain physical custody of his children, Danielle Wilfred (then 5 years old) and Isaac Wilfred (then 3 years old). The purpose of my accompanying Harmon was to assist in caring for the children once they were in his physical custody. I attended all of the planning meetings with Harmon, Mr. Wheelock and Ms. Kelley in preparation for the divorce service and retrieval of the children.
- 3) Harmon picked up his children from his then wife Dearnna at her hotel in Scottsdale as per Mr. Wheelock's instructions on October 10, 1997. It is my understanding that Dearnna was also accompanied to Scottsdale by her parents, Earl and Gladys Garcia.
- 4) From October 10, through October 14, 1997 Mr. Wheelock's wife, Jenene Kelley remained with us in Scottsdale to assist me with the children as they were displaying signs of having been abused. Mr. Wheelock also stayed in Scottsdale to talk to Dearnna and her father, Mr. Earl Garcia, about the divorce. Mr. Wheelock and Ms. Kelley returned to Colorado Springs, Colorado on October 14, 1997.
- 5) On the morning of October 16, 1997, we were scheduled to leave from Phoenix, Arizona for Toronto, Ontario at 10:45 AM Arizona time. (see Exhibit A). Harmon, the children and I got up early that morning and left the hotel in Scottsdale at approximately 7:30 AM in order to allow for our one hour drive to the airport in Phoenix, Arizona during rush hour, the return of our rental car, catch a shuttle bus to the airport terminal and meet the international flight check-in requirement of at least one hour before departure.
- 6) From the time we arose the morning of October 16, 1997 until we arrived in Toronto, drove to our home in Stratford, Ontario and then retired just before midnight that night, I was with Harmon and the children every moment. During the entire day of October 16, 1997, to my knowledge, Harmon did not receive or make any telephone calls nor did he communicate with anyone by telephone, fax or any other long distance communication service.

Further Affiant sayeth naught.


Carolyn R. Dare

Subscribed and sworn to before me this 18 day of January, 2000, by Carolyn R. Dare in the city of Stratford, Province of Ontario, Canada



WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

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EXHIBIT A

SALES PERSON: 06
 CUSTOMER NBR: C10446

ITINERARY/INVOICE NO. 0040041
 QRMKYD

DATE: 16 OCT 97
 PAGE: 01

TO: MR DON GILLMORE
 MS CAROLYN DARE
 136 WESTVALE DRIVE
 WATERLOO, ONT
 N2T 1C1

FOR: WILFRED/HARMON MR
 WILFRED/ISAAC MSTR
 WILFRED/DANIELLE MISS
 DARE/CAROLYN MS

16 OCT 97 - THURSDAY
 AIR UNITED AIRLINES FLT: 1218 ECONOMY LUNCH
 LV PHOENIX 1045 EQP: DC-10
 DEPART: TERMINAL 2 1552 NON-STOP
 AR CHICAGO OHARE
 ARRIVE: TERMINAL 1
 WILFRED/HARMON SEAT-16C
 WILFRED/ISAAC M SEAT-16D
 WILFRED/DANIELLE SEAT-16E
 DARE/CAROLYN MS SEAT-16F
 AIR UNITED AIRLINES FLT: 524 ECONOMY EQP: 737-STRETCH
 LV CHICAGO OHARE 1710 NON-STOP
 DEPART: TERMINAL 1 1942
 AR TORONTO ON
 ARRIVE: TERMINAL 3

30 DEC 97 - TUESDAY
 MCC TORONTO ON
 PREPAID TKTS
 UA 5046303655

BILLED TO VI4518219820713015	3,764.48*
257.70 G.S.T./H.S.T.	257.70*
TOTAL BASE	3,462.00
TOTAL TAX	362.48
TOTAL G.S.T./H.S.T.	257.70
NET OF BILLING	4,082.18*
TOTAL AMOUNT DUE	2.00

AFFIDAVIT

The Affiant, Donald A. Gillmore, age fifty-two, being first duly sworn upon oath, deposes and states as follows:


1. I first met Harmon L. Wilfred in person on June 2nd, 1997, having worked with him remotely four months previously in prospective international funding of major projects, specifically in Asia. We both gained such mutual respect that we became business partners in September, 1997, in Arcore International Funding, L.L.C. in which Harmon is CEO/Manager and I am Director of Operations/Manager.
2. During the summer and fall of 1997, while Harmon was in Canada with me on business, he was in daily phone conversation with Dearna Garcia Wilfred, his wife, and his children, Danielle and Isaac. On several occasions, I was the one who answered the phone and spoke with Dearna, either prior to her speaking with Harmon or when he was out at the time. She often spoke of the major difficulties she had in handling the children and that she could not wait for Harmon to take them. In one call, Dearna stopped speaking to me suddenly to shout at Isaac after which I heard her slapping and scolding him; then, she simply hung up the phone. It was very common for me to hear Dearna swearing at or about the children. Often, she was relatively polite with me on the phone, then suddenly lost her temper totally and slammed the phone in my ear, something I observed her do regularly with Harmon as well. Not uncommonly, she called again half an hour later as though nothing had happened or, on occasion, apologised to me for her bad behaviour. She often made totally irrational requests. These precipitated her bizarre and most unstable, erratic, irresponsible behaviour when I did not agree with these types of requests, and she immediately lost her temper.
3. When Isaac and Danielle Wilfred first arrived in Canada with their father in October of 1997, the children were displaying behaviour which indicated that they had been abused emotionally, verbally, and physically by their mother, Dearna. Harmon was being assisted by Carolyn Dare, a friend of mine with a professional background in child care, whom I introduced to Harmon. I have known Ms Dare since 1991. I observed that it took considerable work on the part of both Harmon and Carolyn over several weeks to calm the children down, to stop them from constantly shouting (the primary means of communication from Dearna, according to the children), and to become confident that they were not going to be abused by Dearna any more nor have to return to her. Initially, whenever Danielle did something wrong, she ran and hid in fear. She explained to me that this is what she did with Dearna in such situations because she was afraid of her mommy Dearna who hit her all the time. Danielle said that she had to hide in the closet or under the bed for protection. Isaac was so insecure that he refused to be toilet trained when he first arrived in Stratford. Whenever he needed to have a bowel movement, he would hide in the closet, as he said he had done when living with his mommy Dearna because he was afraid of her and didn't like it when she would rub his soiled diaper in his face. Both Danielle and Isaac also commented several times to me how much they feared Grandma Garcia because she was so mean and often hit them.

4. On occasion when I came to visit, Harmon and Carolyn would ask me to baby-sit the children so that they could go out and take care of errands. Both the children enjoyed being with me. Whenever I first arrived, they would both come running to me calling out my name in excitement, would give me a big hug, and would want to be picked up so they could give me a welcome kiss. Isaac in particular would often cling onto my legs with affection. In fact, both children were very affectionate with me. When I asked them why they enjoyed so much hugging and kisses, they said they were never hugged and kissed while living with their mother. We usually would sit in the living-room while Isaac was playing with his toys at my feet and watching television. Danielle would climb onto my lap or sit beside me on the couch wanting me to read her stories or to join her in playing with her toys. Neither of the children ever strayed far from my side. Both would grab my hand and take me to their rooms to show me their latest artwork which was hanging on the walls. They also took me to their classroom to show me what they had done recently and what they were learning in school. They often would help me to get my coat and shoes to go out and play with them in the backyard, particularly in their tree house. Other times, they would just want me to sit with them on the dining-room floor to join them in petting Goliath, their dog. They were always very talkative and happy with me. Quite often, Danielle would just want to snuggle in my arms on the couch while watching television. They had built a close bond to me similar to the one they had with Harmon and Carolyn and always fondly called me "Uncle Don". It was not uncommon for me to be playing and conversing with either of the children only to have them give me totally unsolicited, strongly negative comments about Dearnna. Isaac in particular kept saying "I never want to see Dearnna again because she was mean to me" and "she was mean to me all the time". He always referred to her as Dearnna and not as his mother. It was clearly obvious by the children's behaviour and comments that they accepted Carolyn totally from the very beginning and loved her dearly as she fulfilled the role of mother in a proper, acceptable, and loving manner. Danielle in particular referred to Carolyn as her "mommy".
5. Once while I was playing with Isaac, he suddenly asked me if I was ever going to go to Colorado with him. When I asked him why he would ask me such a question, he told me in a very serious tone that I would have to hide in the closet if mommy Dearnna was there with us because she would hit us if she found us. I never once ever heard either Danielle or Isaac ask for their mommy Dearnna, although several times when Dearnna came into our conversation, both children would comment that they never wanted to see her again because she was so mean to them all the time. I also never once heard either of them say so much as one negative word about their father; on the contrary, they always praised him, said how much they loved him and Carolyn, and how Harmon and Carolyn were so loving and good to them. Their behaviour around Harmon clearly showed a very strong love and close, positive bond with him, as was the case with Carolyn whom they did refer to as their mom.
6. Harmon is one of the most gentle, understanding, patient, and totally committed fathers I have ever known. His life revolves around his children and Carolyn, and in building a loving, stable, family environment for all of them. He encourages good manners, never abuses them in the slightest way, never screams at them, and shows them all proper respect and complete love. The ongoing efforts of both Harmon and Carolyn in overcoming the

tremendous negative influence by Dearn on both children became increasingly obvious over those months as Danielle and Isaac settled down so well and, as indicated by their behaviour and comments, were clearly happier than they had ever been before.

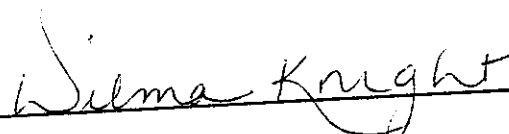
7. With Harmon and I also establishing business headquarters in Stratford and through our daily interaction, there is no question in my mind of his stability and sincerity both as an honest and reputable business partner and as an excellent father to his children. Without question, I have never in my working career worked so well with anyone nor held such high respect both professionally and personally.

Further Affiant sayeth naught.



Donald A. Gillmore

Subscribed and sworn to before me this 15th day of November, 1999, by Donald A. Gillmore in the City of Stratford, Province of Ontario, Canada.



WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

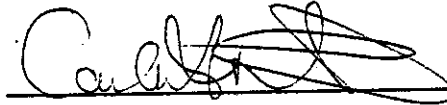
AFFIDAVIT

The Affiant, Carla D. Leverette, age twenty-four, being first duly sworn upon oath, deposes and states as follows:

1. I first met Harmon Wilfred through my mother, Carolyn Dare, in July of 1997. Whenever I was with Harmon, he always spoke lovingly of his children. He often said that he missed his "kids" more than anything, even though he spoke to them every day by telephone.
2. I met Harmon's children, Danielle and Isaac Wilfred, upon their arrival in Canada in October of 1997. I was hired to be the children's nanny and assisted Harmon and my mother in caring for the children 5 days per week. Both children repeatedly told me that they loved Harmon and were very happy to be in Canada with their dad. Danielle always called my mother "mommy" and Isaac called her "mommy Carolyn".
3. During my care of the children from October, 1997 to February, 1998, both Danielle and Isaac asked constantly if they would ever have to see their "mommy Dearnna" again. They said repeatedly that they never wanted to see her again, that she was always mean to them, and that they wanted to stay with their dad and mommy Carolyn forever.
4. Both children told me about the dog that their grandparents have and that they missed it and their grandpa. When I asked about their grandmother, they told me that she was mean to them too and that they never wanted to see her again.
5. Isaac told me that "mommy Dearnna doesn't like me". When I asked why not, he said that, "she doesn't like anyone and she was always mad".
6. On one occasion, Danielle was pushing Isaac while on the stairs. Isaac came and told me what had happened. I was occupied in the kitchen at the time so I called to Danielle to come and see me to talk about it. When she didn't come, I went looking for her. I found her in a room hiding behind a chair and crying. I asked her why she didn't come when I called her. She told me that she thought that if she came to me, she was afraid that I would hit her because that's what mommy Dearnna did.
7. When we were potty training Isaac, he would never want to wipe his own bottom. He would always yell for someone to come and do it for him. He said that he didn't want to do it himself because there were worms in his "poopoo" and he didn't want to touch them. He told me that Dearnna and her parents told him that the worms were going to bite him.
8. Whenever Harmon and Carolyn were out, both the children would always ask when they were coming back. They always asked more than once, especially when Harmon and Carolyn were gone for more than one hour. When they would return home, the children would greet them at the door with hugs and kisses, telling them how much they missed them.
9. Isaac asked me one day if mommy Dearnna was going to come and live with us. When I said no, he replied that "if she did, she would be mean to all of us and would hit us".

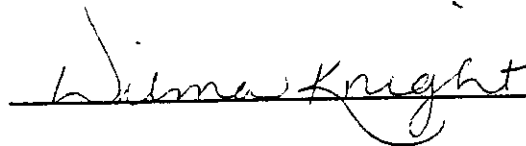
10. When the children first arrived, Danielle was very withdrawn and Isaac was very aggressive. However, over time, both children realised that they were in a very loving family in Canada now with many people around them who love them and would never harm them in any way.
11. Harmon's devotion to his children is amazing. He is such a loving and compassionate father that any child would be happy to call him "dad".
12. Now that Harmon and my mother are married, Harmon has been a very important fatherly influence in my life.

Further Affiant sayeth naught.



Carla D. Leverette

Subscribed and sworn to before me this 15th day of November, 1999 by Carla D. Leverette in the City of Stratford, Province of Ontario, Canada.



WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

AFFIDAVIT

The Affiant, Tanya L. Leverette, age twenty-two, being first duly sworn upon oath, deposes and states as follows:

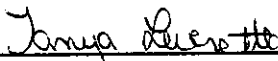
1. My mother, Carolyn Dare, first introduced me to Harmon Wilfred in July of 1997 while we were living in Waterloo, Ontario and Harmon was staying with a business associate in Guelph, Ontario. In October of that year, while I was on a 3-month university course, Harmon and Carolyn made the decision to get married and relocated our residence to Stratford, Ontario with Harmon's two children, Danielle, age 6, and Isaac, age 4. I returned home to Stratford on December 24th, 1997. Upon my arrival, Harmon and Carolyn asked me to assist them in home-schooling the two children. My sister, Carla Leverette, had been working with the children as their daytime nanny since October, 1997. In working with Danielle and Isaac for several months, Carla and I came to know both the children and Harmon very closely. It was obviously a very happy family, and Harmon's face would light up completely with joy as he watched his children open and enjoy their Christmas gifts.
2. I never in all my time there heard Harmon raise his voice to his children or even do anything that could remotely be considered abusive. Often, Harmon and Carolyn would run errands in the afternoon and the children would run to the window and wave goodbye. If Harmon and Carolyn were gone long, inevitably one of the children would ask when mommy and daddy were coming home. Every now and then, one of the children, totally impromptu, would recall a story from when they lived with Dearnna. Danielle once told me that Dearnna would not permit her to go outside and play because her mom said that Danielle had to wash the windows first. Danielle could not have been more than 5-years old at the time, as she had just turned 6 in October of 1997. Isaac repeatedly told me that he never wanted to see "Mommy Dearnna" again and that he wanted to stay with us forever. Neither of the children ever asked where their mother was, nor asked when they were going to see her again. During my time living with them, Harmon was a very attentive father. He would always listen to his children and spoke to them in a manner filled with love and respect. The children responded to this attitude by being devoted to their father, invariably running to meet him at the door when he returned, clamouring to be the first to tell him of their accomplishments of the day.
3. One day during a home-schooling session, I asked Danielle to draw a picture of her family as suggested in the home-school manual. It also suggested that she write feelings that she associated with each person. Her picture consisted of Isaac, Mommy Dearnna, Dad, Mom (Carolyn), Danielle, and two dogs. The feelings she wrote were: Isaac—funny; Mommy Dearnna—mad; Dad and Mom—happy. [See attached copy of that picture.] When I asked her why she labelled her mother as "Mad", she said, "Mommy Dearnna is always mad at everyone".
4. Through my experiences with babysitting and general association with families for many years, I have never seen a happier family, filled with so much love and mutual respect as are

the children with Harmon and Carolyn. It was very obvious how devoted Harmon is to his children and the feeling was mutual.

5. On February 14th, 1998, Danielle, Isaac, and I were walking down to the lake in Stratford to feed the ducks. We had just crossed the Festival Bridge and were heading down to the lake when I saw a strange woman staring intently at the children. She walked up to Danielle, caught hold of her, and pushed back the hood of her coat. The woman then cried out and pulled Danielle toward her. Danielle did not hug Dearnna or respond with any noticeable reaction of happiness or excitement at seeing her mother. In fact she appeared to be shocked, withdrawn, and fearful. Not knowing who she was, I immediately stepped forward to intervene when a man touched me on the shoulder and said that he was from the Stratford Police. He then waved some papers, said that he had a warrant, and that she was the children's mother. By this time, Dearnna had pushed back the hood of Danielle's coat and was shouting "It's mommy, it's mommy". Danielle continued to withdraw to the extent that she would not even raise her head to look at her mother. Meanwhile, Isaac had run behind me and was whimpering and clutching my leg. Because Danielle was still not responding to Dearnna, she pulled out her passport to show Danielle who she was as she continued to raise her voice by saying, "don't you know me, see, I am your mommy". Danielle still did not give her a hug or respond in any other way other than just stand there in apparent shock. Dearnna made no attempt to come over to Isaac and talk with him. She seemed most interested in Danielle.
6. At no point during the initial reintroduction did either of the children express excitement to see their mother or ask her where she had been. The police then herded us all up to the cars while deliberately keeping Dearnna away from any contact with me. Isaac was still holding on to me crying, obviously afraid of Dearnna. At this point, I had picked Isaac up and was carrying him because he was crying and he didn't want to go with his mother. Danielle was not saying anything the entire time that Dearnna was fussing over her, shouting at her over and over saying "They've cut your hair! What have they done to you?" She barely looked up at her mother and didn't attempt to touch her or reciprocate her greetings. It was decided by the policemen present that Danielle should go with Dearnna to the police station while Isaac would ride with me, as he was still crying and refusing to leave my side. Before we got into the car, Danielle noticed that Isaac was very unhappy and scared. She came over to him and told him that "It's mommy, Isaac. We have to go with her." This did not soothe Isaac in the least as he kept on crying and holding onto me. In the car, he began to ask about Dearnna, always referring to her as "Dearnna", never as "mommy". He asked if Dearnna was going to live with us now, and I told him no. He asked why. I told him I didn't know. During the ride, the policeman remarked that it was strange that Isaac wasn't happy to see his mother at all. We arrived at the police station and were taken inside where we met Dearnna's mother. As soon as Isaac saw her, he ran around a corner and hid behind a desk. I had to coax him out and even then, he was very frightened and reluctant. I overheard Dearnna cursing in front of the children calling me a bitch and making derogatory remarks toward me to the extent that the police Sergeant in charge reprimanded and verbally restrained her stating that he did not believe that such remarks were necessary and that I seemed to be a nice girl. I also couldn't help overhearing Dearnna continuing to attempt to solicit a positive

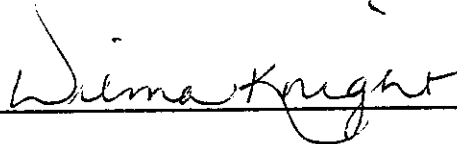
response from the children by offering them what she said was their favourite candy and presenting presents from all the holidays that she insisted they had "missed". I was then placed into an interview room and the children were escorted to another part of the building with Dearna and her mother. That was the last I saw of the children and I was released after the police had arrested Harmon. Just before we left, one of the Officers came to me and told me that the children were asking for me, but of course I was not permitted to see them.

Further Affiant sayeth naught.



Tanya L. Leverette

Subscribed and sworn to before me this 15th day of November, 1999, by Tanya L. Leverette in the City of Stratford, Province of Ontario, Canada.



WILMA ROSEMARIE KNIGHT, a Commissioner, etc.,
County of Perth, for the Government of Ontario,
Ministry of the Attorney General.
Expires September 29, 2001.

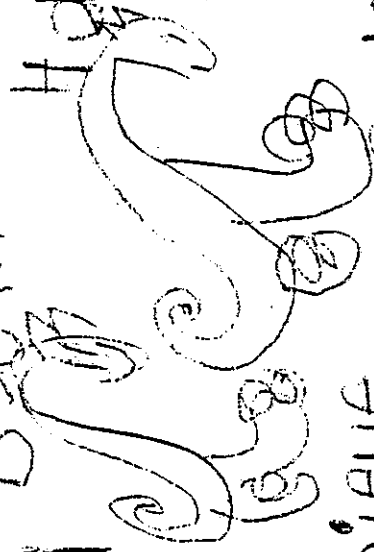
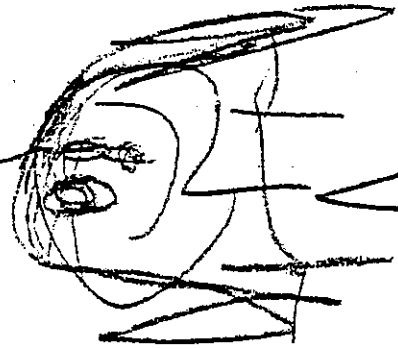
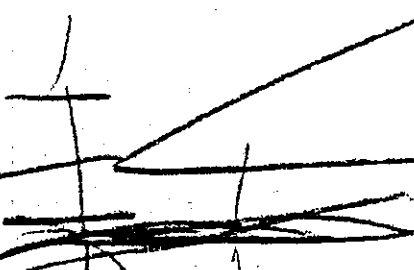
Miss C. Mason

MOM
MOM

DAD

HAPPY

MOM



ISAAC
FAMILY

HAPPY

Danielle

Niece
Buckie

HAPPY

Edith

22

AFFIDAVIT

2/18/98

The Affiant, Jenene Kelley, being duly sworn upon oath, states as follows.

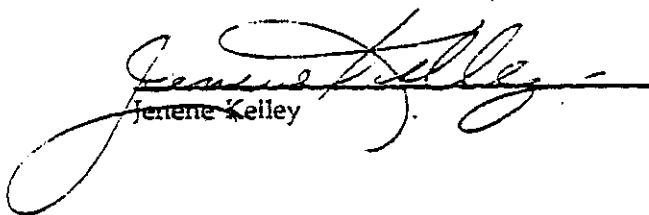
During the month of September, 1997, my husband Seymour Wheelock was asked by Harmon Wilfred for legal assistance. Seymour was asked to make a business trip to Phoenix, AZ to which I accompanied him. I am a Social Worker working for a private agency. I was not present in an official capacity. During the time that we were in Phoenix after Harmon obtained his children I heard and witnessed the following behavior from the Wilfred children.

I observed that the children were very happy to see their father. I heard Danielle ask her father if she had to go back to her mother. During the course of our visit, Danielle stated to me that her mother was mean to her. When I asked her in what way, she stated that her mother yelled and screamed a lot and sometimes would hit her. While combing her hair she stated that her mother would pull her hair. Danielle was starved for attention and affection.

I further heard Isaac state that his mother was going to rub his face in his dirty diaper. Isaac showed fear of going to the bathroom. He had problems with his toilet training. I observed upon Isaac's arrival that he had an uncontrollable nervous laughter. I observed a child who did a lot of hitting. I asked Isaac why he hit people, he stated because his mom hits people. I asked him if she had hit him and he said, "sometimes." He further stated to me that she screams a lot at him.

I also observed that over the course of three days, the children were quite comfortable around their father. I observed Harmon Wilfred participating with his children, laughing, playing and loving them. Danielle and Isaac were delighted with this interaction by their father.

Further Affiant sayeth naught.


Jenene Kelley

COLORADO NAAMY :

THIS AFFIDAVIT IS A TYPED VERSION OF THE

AFFIDAVIT

HAND WRITTEN AND SIGNED STATEMENT ATTACHED

The affiant, Janet H. Reinhard, being first duly sworn upon oath, deposes and states as follows:

1. I was asked by Harmon Wilfred to take care of his two children, Danielle and Isaac, in the early spring of 1996. For the first couple months, I was sole caretaker when their dad was not with them. I noticed that the relationship between the children and their dad was beautiful; they adored him. I learned to love those two children as if they were mine. Their mother was in Denver, but decided to come down and live in the same home. I stayed on as caretaker of the children.
2. I began to notice many things about Dearnna. She did not interact with the children – for the most part, she ignored them. She seemed to have a fetish concerning the laundry and the washing machine was going on a constant basis every day. Dearnna spent her time upstairs, coming down only occasionally. Whenever I went upstairs to ask a question or to let her know that we were going out, she would be on the phone or watching TV. I dressed the children in the morning, fed them, and took care of their needs. Dearnna would go from one extreme to the other, first saying nice things, then turning on the children for no apparent reason. I observed this on a daily basis.
3. At one point in particular, Dearnna ran downstairs because to her, they were making too much noise. She began chasing Danielle and screaming at both children. Danielle had a look of horror on her face and ran to me, hugging my legs. Her mother stopped at that point and began to irritate Isaac to the point where he began screaming. Dearnna finally gave it up and stomped upstairs.
4. I would be working with the children and Dearnna would come downstairs and interfere, not as a mother would do, but obviously to make an appearance. There were times she would go off in the car without so much as a good-bye to anyone. The children would call “mommy” and soon realize she wasn’t there. Dearnna would lie and talk negatively about me when I wasn’t there. But, Danielle would tell me the next day saying things no four- or five-year old would make up, partly because she would have no reason to.
5. When the children’s father had to be out of town on business, the situation began to get worse. Dearnna would have money to run hither and yon but there would be very little food in the refrigerator to feed the children. When she did go to the store, she’d come back with many “goodies” but very little in the way of nourishing food for the children. Trying to keep them fed was a problem she left up to me. Often times, I would take them in the car and feed them. As a mother who raised four boys, it was obvious to me that Dearnna did not enjoy being a mother and did not care to learn. She was a self-centered child in a position only an adult should have.
6. At one point, Dearnna’s mother came by to pick her up. The grandmother stepped inside the door and I was shocked at the reaction of the children. Danielle came to me and hid behind the wall and Isaac just stood there. I mentioned to Danielle that she should go see her grandma. The child’s response was “I’m afraid of her. She’s mean.” On many other occasions, Danielle referred to her grandmother as mean.

7. Often times, their mother would just yell at them from upstairs, not ever bothering to come to investigate the situation, which I had under control anyway. They were allowed to climb on everything, and one time, Danielle was sitting on the table and wet herself. I truly believe I did what I could, but I was not with the children on a twenty-four hour basis.

This is not hearsay since I was there and witnessed this on a daily basis.

Further affiant sayeth naught.

STATE OF COLORADO)
) ss:
County of El Paso)

Subscribed and sworn to before me this day of , 1998 by Janet H. Reinhard.

Notary Public

JANET REINHARD - COLORADO NANNY

I was asked by Harmon Wilfred to take care of his two children, Cornelle and Isaac in the early spring of '96. For the ~~first~~ ^{first} couple of months I was sole caretaker when their dad was not with them. I noticed the relationship between the children and their dad was beautiful they adored him. I learned to love those two as if they were mine. Their mother was up in Denver, but decided to come down and live in the same home, but I stayed on as caretaker of the children. I began to notice ~~me~~ ^{her} things about Deanna. She did ^{not} interact with the children - for the most part, ignored them. She seemed to have a fetish concerning the laundry and the machine were going on a constant basis every day. She spent her time upstairs, coming down only occasionally. Whenever I went upstairs to ask a question or let her know we were going out she would be on the phone or watching TV. I dressed the children in the morning, fed them and took care of their needs. Deanna would go from one extreme to the other - first saying ^{nothing} ~~nothing~~ ^{nothing} turning on them for no apparent reason. I saw this on a daily basis.

At one point in particular she ran downstairs because to her they were making too much noise. She began chasing Danielle and screaming at them. Danielle had a look of horror on her face and ran to me, hugging my legs. Her mother stopped at that point and began to irritate. I began to retreat to the point she began screaming. She finally gave it up and stopped upstairs. I would be working with them and she would come downstairs and interfere, not as a mother would do, but obviously to make an appearance. There were times she would go off in the car without so much as a Goodbye to anyone. The children would call "mommy" and she would realize she wasn't there. Deanna would be and talk negatively about me when I wasn't there, but Danielle would tell me the next day saying things no 4 or 5 year old would make up. Partly because she would have no reason to. When the children's father had to be out of the country on business the situation began to get worse. Deanna would have money to run kitchen and gas, but there would be very little food in the refrigerator to feed the children. When she did go to the store she'd come back with many "goods" but very little in the way of nourishing food for

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the children. Trying to keep them fed was a problem she left up to me. Often times I would take them in the car and feed them. As a mother who raised four boys, it was obvious to me Leanna did not enjoy being a mother and did not care to learn. She was a self centered child in a position only an adult should have. At one point Leanna's mother came by to pick her up. The grandmother stepped inside the door and I was shocked at the reaction of the children. ~~Danielle~~ Danielle came to me and hid behind the wall and I just stood there. I mentioned to Danielle that she should go see the grandmother. The child's response was "I'm afraid of her, she's mean." On many other occasions Danielle referred to her grandmother as mean. Often times their mother would just yell at them from upstairs and even bother to come to investigate the situation, which I had under control anyway. They were allowed to climb on every thing, and one time Danielle was sitting on the table and met herself. I truly believe I did what I could, but I was not with them on a twenty four hour basis.

This is not hearsay, since I was there and witnessed this on a daily basis.

Darrel H. Penland

AFFIDAVIT

To whom it may concern:

My exposure to Dearna G. Wilfred was somewhat limited. I do however, recall a particular incident involving Dearna that I found quite disturbing. In my opinion, the behavior described below portrays Dearna as being a person that is irrational, volatile and unstable. It also displays a blatant disregard for those around her including her children.

In the fall of 1996, I was sitting at the computer station in Harmon's office. I was on a long distance call with a prospective client. Harmon was also in the room looking for something in the file cabinet. All of a sudden Dearna came barging into the office with both Isaac, who was in a stroller, and Danielle. Dearna was outraged because there was a vehicle parked in Harmon's reserved parking space in the parking garage next to our office building.

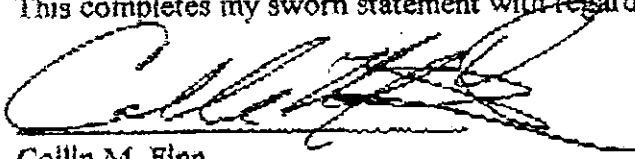
The children were visibly upset with regard to Dearna's behavior. Isaac was crying and Danielle ran to Harmon and clung to his leg. As I held my hand over the phone, trying to keep our client from hearing what was going on, Harmon picked Danielle up and ushered everyone out into the reception area. Once there, Harmon proceeded to explain to Dearna that the vehicle in his space was mine.

I managed to get off the phone almost immediately after Harmon, Dearna and the children left the office. I sat in disbelief listening to Dearna become even more enraged. I could hear her punching the elevator buttons and swearing at the elevator because it was not returning to our floor fast enough. She refused to wait for it and took the stairs, leaving the children with Harmon. Dearna went downstairs to search for a police officer (in the rain) to have me "arrested for parking in Harmon's space"

As I remained in the office, I could hear Harmon trying to calm the children in Dearna's absence.

I returned to my office so as not to create more confusion. When Dearna returned a short while later, I could hear her behaving as though nothing had happened.

This completes my sworn statement with regard to Dearna G. Wilfred.

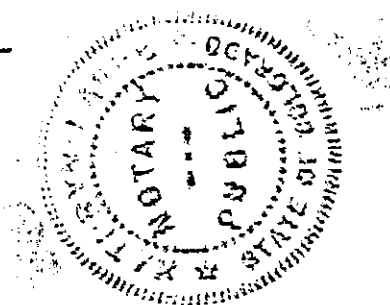


Collin M. Finn

This document has been subscribed and affirmed or sworn before me in the county of El Paso, State of Colorado, this 15th day of February, 1998.

Harshad Darg
Notary

12-4-2001
Date my commission expires.

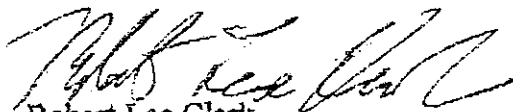


15 February 1998

To whom it may concern,

In October of 1997 I had a conversation with Dearna G. Wilfred immediately following a custody hearing at the El Paso County District Court House in Colorado Springs, Colorado. The hearing was about the custody of the children of her and Harmon L. Wilfred. In that conversation she said to me that she was not concerned about the children because they were with their father.

Sincerely,



Robert Lee Clark

AFFIDAVIT

The affiant, Philip C. Freytag, being first duly sworn upon oath, deposes and states as follows:

1. I have known Harmon and Dearna Wilfred since late fall 1992. They were living in Trinidad with Dearna's grandmother at the time and were suffering from severe financial reverses and family disagreements. In an effort to assist Harmon to get back into business I introduced him to friends who were in the real estate business. My wife and I invited Harmon, Dearna and their infant daughter to live with us temporarily during the Christmas holidays while he attempted to find work. In January of 1993, I purchased some of their personal goods and an automobile to provide them with enough cash to move to Colorado Springs where Harmon began work with a real estate company.
2. In July of 1994, Robert Clark, Harmon Wilfred and I entered into a business relationship known as Arch Investments International for the purpose of engaging in general real estate and development activities. In January of 1995 Harmon resigned from Arch to accept an offer with Alpha & Omega of Colorado Springs.
3. On February 3, 1997 an agreement was made between Harmon Wilfred, or assigns, and Alpha Project, of which I am a trustee, for the purchase of land held by Alpha, subject to closing of a note transaction known as "Mitsubishi Note" which was under contract and on which commissions would be due Arcore International Funding, L.L.C. Harmon is CEO/manager of Arcore.
4. On April 14, 1997, I agreed personally to advance limited funds to Arcore and Harmon Wilfred, secured by a partial assignment of proceeds from the "Mitsubishi Note" transaction.
5. At all times my business relationships with Harmon Wilfred have been satisfactory. He has always been honest with me in every detail. I assisted him in an attempt to collect amounts due him from a real estate firm in Colorado Springs. The firm was doing business with a county pension fund whose manager was involved in embezzlement and fraud, but due to Harmon's limited financial resources, Harmon was unable to pursue his case and is still owed tens of thousands of dollars.
6. On October 17, 1997 I was in Colorado Springs District Court as an observer of an emergency temporary custody hearing in the Wilfred case. After the hearing, Dearna Wilfred was talking to a group of people who had been in court. She made the statement that she was not worried about her children being with Harmon, that she knew he would take good care of them. She also made this statement to me on at least two other occasions.

7. As a friend of both Harmon and Dearnna, I attempted to arrange a settlement between them, but was totally rebuffed by Dearnna and gave up. I talked to both Dearnna's attorney and Harmon's attorney. Her attorney was abusive, demanding and made statements about Harmon that I considered untrue. Harmon's attorney was easy to talk to and expressed the opinion that the children were actually in danger, at least from a psychological standpoint, in Dearnna's care. Because he assisted Harmon in taking custody of the children without a court order, he said he was in danger of being disbarred.

8. Dearnna's attorney and Dearnna both stated to me that they were only interested in custody of the children and not in any financial settlement. Almost in the same breath the attorney said he was spending an inordinate amount of time on the case and did not like working for nothing. I thought these statements were ridiculous and irresponsible, since Dearnna would need to have financial support to raise the children by herself.

9. My observations of the Wilfred family indicate that Harmon is by far the better parent and the most stable individual of the two. He loves his children to an almost extreme degree which might be considered as neglect of his wife. This, added to a poor financial situation, resulted in what I thought was a very boring life for Dearnna. I see Dearnna as being unduly influenced by her mother in spite of her complaints about the way her mother treated her.

Further affiant sayeth naught.

Philip C. Freytag

STATE OF COLORADO)
) ss.
County of Fremont)

Subscribed and sworn to before me this 16rd day of February, 1998 by Philip C. Freytag.

Julie M. Reeves
Notary Public

My commission expires: 10/21/2000

