

Declaration of
Ronda J. Blair

DECLARATION OF RONDA J. BLAIR

I, Ronda J. Blair, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. §1746, that the following is true and correct, and that I am competent to testify as to the matters stated herein:

1. I am over 21 years of age. I am employed by the United States Securities and Exchange Commission ("Commission") as a staff attorney and have been employed in this capacity since May 20, 1990. I have been a member in good standing of the Nebraska State Bar Association since September 18, 1989.

2. I make this declaration based upon information gathered during the course of a Commission investigation into DM Marketing Services, Inc. ("DM Marketing"). The source of my information and the basis for my belief are documents I reviewed and statements by witnesses.

3. In the 15 years that I have been employed by the Commission as a staff attorney, I have performed numerous enforcement investigations. As part of these investigations, I am frequently required to review and analyze records, conduct sworn testimony and interview witnesses in order to determine if violations of the federal securities laws have occurred or are occurring.

Background

4. DM Marketing first came to my attention on or about July 1, 2005 by the Federal Bureau of Investigation ("FBI"). The FBI referred a complaint to me that had been filed against Dan Moody ("Moody") for soliciting persons to invest in a World Bank Deposit Program ("World Bank programs") through his company DM Marketing Services, Inc. ("DM Marketing").

5. On August 11, 2005, I interviewed Moody, who told me that, on or about July 2004, Dwight J. Johnson ("Johnson") and Harry Robinson "Robbie" Gowdey ("Gowdey")

introduced him to the World Bank programs. They described the World Bank programs as fractional lending programs operated by Travis Correll ("Correll") and Grant Cardno ("Cardno"), who were "good Christian people," paying monthly investment returns of up to 7.5 percent with no risk to the principal investment. (See, Moody Declaration ¶¶2-4). Johnson and Gowdey also told Moody that the funds would be pooled in a bank account for TNT Office Supply, Inc. ("TNT"), controlled by Gregory W. Thompson, before being sent to Correll, the "money manager," who then forwarded the money to Cardno. (See, Moody Declaration ¶5). Finally, Johnson and Gowdey told Moody that he could earn commissions by referring other investors to the program. Based on Johnson's and Gowdey's representations regarding World Bank program, Moody, became an investor and a finder for the World Bank program. Moody personally invested approximately \$200,000 and raised approximately \$2.2 million from 20 other people to invest in the World Bank programs. (See, Moody Declaration ¶7)

6. After speaking with Moody, I researched the background of Correll, Thompson, Gowdey, Johnson and Cardno, as well as the legal status of various entities with which they are associated. Additionally, I interviewed investors and reviewed documents produced by them, including communications with Correll, Cardno, Thompson, Gowdey and Johnson. I also reviewed the bank records for numerous bank accounts in which investors' funds were deposited, transferred to and from which investment returns were disbursed. Finally, I researched the background of Neulan Midkiff ("Midkiff") and the legal status of Joshua Tree Group LLC ("Joshua Tree") after receiving information from Federal law enforcement agencies regarding their relationship with Correll and his entities.

Persons and Entities Associated with World Bank Programs

7. My research into the backgrounds of the defendants and relief defendants is set forth in paragraphs 8 through 19 below:

8. Correll, age 29, resides in Atlanta, Georgia, and claims to be a business consultant doing business as Horizon Establishment in connection with the World Bank programs. Correll asserted his Fifth Amendment Privilege in response to the Commission's subpoena seeking documents and testimony. (Blair Exhibit 1). Correll is not registered with the Commission in any capacity.

9. Travis Correll & Co., Inc. ("TC&Co.") is a Georgia corporation with its principal place of business located in Suwanee, Georgia. In an April 14, 2005 document, signed by Correll as president, TC&Co claims to be a "a diversified investment company" that "makes loans to institutions and do[es] not invest in real estate." TC&Co. is not registered with the Commission in any capacity.

10. The Net Worth Group, Inc. ("Net Worth Group") is a Georgia corporation established on May 25, 2005 with its principal place of business in Atlanta, Georgia. Correll, Net Worth Group's registered agent, is also a signatory on its bank account. Net Worth Group is not registered with the Commission in any capacity.

11. Thompson, age 52, resides in San Antonio, Texas and is the president and director of TNT. Thompson asserted his Fifth Amendment Privilege in response to the Commission's subpoenas seeking documents and testimony. (Blair Exhibit 2). Thompson is not registered with the Commission in any capacity.

12. TNT, a Texas corporation, is an office supply company located in San Antonio. TNT's bank account, which is used to pool investor funds and to pay investment returns, is controlled by Thompson. TNT never produced any documents in response to the staff's subpoena. TNT is not registered with the Commission in any capacity.

13. Gowdey, age 53, resides in Frisco, Texas and is doing business as Atlas and Jericho Productions in connection with the World Bank programs. From June 1983 through December 1988, Gowdey was an associated person with various Commission

registered broker-dealers and held various securities licenses. On October 3, 1989, the NASD revoked Gowdey's registration for non payment of fines and costs relating to its complaint against him.¹ Gowdey asserted his Fifth Amendment Privilege in response to the Commission's subpoenas for documents and testimony. (Blair Exhibit 3). Gowdey is not registered with the Commission in any capacity.

14. Johnson, age 61, resides in Garland, Texas and is Thompson's uncle. Johnson asserted his Fifth Amendment Privilege in response to the Commission's subpoenas for documents and testimony. (Blair Exhibit 4). Johnson is not registered with the Commission in any capacity.

15. Cardno, age unknown, is believed to be a resident of Norfolk Island, a Commonwealth of Australia territory. The Commission has been unable to reach Cardno via telephone or e-mail. Cardno is not registered with the Commission in any capacity.

16. Sovereign Capital Investments, S.A. ("Sovereign," is a purported international business corporation located on Norfolk Island, apparently under Cardno's control. Sovereign is not registered with the Commission in any capacity.

17. The Liberty Establishment Incorporated ("Liberty") is purported to be registered in the British Virgin Islands for "Service to Humanitarian Ideals." It is apparently under Cardno's control and located on Norfolk Island. Liberty is not registered with the Commission in any capacity.

18. Midkiff, age 63, is a resident of Forest Lake, Minnesota. Midkiff is not registered with the Commission in any capacity and has no disciplinary history.

¹ On February 28, 1989, the NASD found that Gowdey had engaged in the offer and sale of unregistered securities without providing written notice to the member employer. Additionally, Gowdey failed to disclose to the prospective investors that he would receive a two percent "finder's fee" in connection with the transactions. As a result, Gowdey was censured and fined \$2,000, ordered to disgorge \$17,975 and suspended from association with any member as a principal for three years for violations of the Rules of Fair Practice. When he failed to pay the fines and costs, the NASD barred him from association with any member.

19. Joshua Tree is a Nevada limited liability company with its principal place of business located in Carson City, Nevada. Nuelan and Donna Midkiff are its members. Joshua Tree is not registered with the Commission in any capacity.

The Offer and Sale of Unregistered Securities

20. Neither Horizon Establishment, TC&Co., Net Worth Group, TNT, Atlas, Jericho Productions nor Banner Shield LLC (an entity controlled by Gowdey) nor their securities is registered with the Commission. (Blair Exhibit 5). Additionally, I searched the Commission's database and found that neither Joshua Tree nor its securities are registered with the Commission.

21. According to bank and other records I have reviewed, from July 2004 through September 2005, World Bank programs have raised approximately \$36 million from the offer and sale of interests in a high yield investment program, or prime bank scheme, to hundreds of persons located throughout United States.

22. I corroborated the information provided by Dan Moody, Thomas Barrett, George Driskell and Michael Wixom in their Declarations by interviewing other investors. These investors told me that they invested in purported bank deposit or bank trading programs claiming to involve world banks, foreign banks or international banks (collectively, "World Bank programs") offered and sold by Correll, Cardno Thompson, Johnson and Gowdey, and their associated entities. Many of these investors are associated with or became aware of the defendants through churches or religious organizations, e.g., Campus Crusade for Christ.

23. Like Moody, Barrett, Driskell and Wixom, the investors I interviewed also described the offering as a private banking investment opportunity in which funds are pooled in TNT's bank account or in the bank accounts of entities controlled by Correll. They were told that Correll is the "money manager," who forwards the funds to Cardno, who resides on an island territory of Australia. Cardno was identified as the "trader" to

some of the investors, but all of the investors were told that Cardno is the person with the ability or the contacts with the international or world banks to participate in the bank trading programs. Cardno purportedly deposits the investors' funds into an offshore reserve account, which is used as leverage to collateralize loans for various humanitarian purposes. The investors were told that their principal investment is safe because it never leaves the reserve account and that the World Bank programs could pay monthly returns from four to 12 percent. Some of the investors were also promised and paid intermediary fees for referring new investors. Finally, to lend an air of legitimacy TNT provided its investors with Forms 1099 MISC.

24. As described in the Declarations of Moody, Barrett, Driskell and Wixom, until September 2005, investors received from TNT or from entities controlled by Correll monthly investment returns from four to 12 percent for each of the programs in which they participated. After September 2005, it appears that none of the investors are being paid.

25. Correll admitted to the Federal law enforcement authorities, that Midkiff invested in and referred others to invest in Horizon Establishment.² Correll also admitted that he paid Midkiff a referral fee of .10 to .25 percent for funds invested by others. I reviewed an analysis provided by Federal law enforcement authorities that showed funds flowing to Horizon Establishment from Joshua Tree and Midkiff, as well as payments from Horizon Establishment to Joshua Tree and Midkiff. Also, I reviewed bank records that show Midkiff, either individually or through Joshua Tree, remitted \$2.552 million to two entities controlled by Correll -- \$900,000 to TC&Co. in January 2005 and \$1.652 to Net Worth Group in August 2005.

² Based on Correll's admissions, I believe that Midkiff may be parroting Correll's sales pitch to prospective investors.

Material Misrepresentations and Omissions

26. Correll, Cardno, Thompson, Johnson, Gowdey and Midkiff, by and through their related entities, are conducting a “high yield investment,” or “prime bank,” scheme. At no time did the defendants disclose to prospective investors the non existence of the World Bank program or any type of bank trading program. According to the Commission’s investor alert on prime bank schemes, most recently issued on September 5, 2003, at <http://www.sec.gov/divisions/enforce/primebank.shtml> these schemes are fraudulent and the trading programs do not exist. Also, see the Declaration of Leonard A. Zawistowski.

27. Additionally, despite the promises of Correll, Cardno, Thompson, Johnson, Gowdey and Midkiff, none of the funds raised by the World Bank programs have been transferred to Cardno, his entities or to any offshore or reserve account. As discussed below, investors’ funds were commingled in and among various bank accounts of entities controlled by Correll (Horizon Establishment, TC&Co. and Net Worth Group), as well as the TNT bank account, before being paid as “investment returns” to investors, which appear to be derived from the investment proceeds of new investors.

Misappropriation of World Bank Program Investor Funds

28. I have reviewed the records for TNT’s account maintained at Security Service Federal Credit Union in San Antonio, Texas for the period July 2004 through October 2005.³ The TNT account received deposits totaling approximately \$36 million from sources other than from bank accounts of entities controlled by Correll. The deposits from the bank accounts of entities controlled by Correll are set forth below:

- \$3.3 million from Net Worth Group;
- \$4.3 million from Horizon Establishment; and

³ The Commission has not received all of the bank records for this account. Thus, the conclusions set forth below are based on limited information.

- \$513,000 from TC&Co.

TNT's bank account shows that TNT made the following disbursements to the bank accounts for entities controlled by Correll:

- \$4.66 million to Net Worth Group;
- \$9.21 million to Horizon Establishment; and
- \$500,000 to TC&Co.

29. The deposit and disbursement activity described in the preceding paragraph is the result of multiple inter-bank transfers between TNT and the bank accounts of entities controlled by Correll.

30. After reviewing the various bank records for Horizon Establishment, TC&Co. and Net Worth Group, I believe that the transactions in and among the bank accounts of entities controlled by Correll, along with the transactions in the TNT account, demonstrate that the World Bank programs operated by Correll, Cardno, Thompson, Johnson, Gowdey and Midkiff are simply an elaborate Ponzi scheme.

31. The TNT account shows that funds transferred from bank accounts of entities controlled by Correll and from new investors were commingled and immediately and routinely used to pay "investment returns" or Ponzi payments to current investors. Likewise, as set forth in the following paragraphs, funds transferred from TNT's bank account to bank accounts of entities controlled by Correll were commingled with new investors' funds and used to pay investment returns to investors.

32. I reviewed TC&Co.'s account number 6140000624 maintained at RBC Centura in Atlanta, Georgia for the period April through September 2005. On April 19, 2005, the account received a \$1 million wire transfer from a Frisco, Texas investor. Between April 20 and April 23, 2005, \$995,052 of the investor's funds were disbursed as follows:

- \$219,321 to other investors or finders;
- \$231,628 to relief defendant Hospitality Management;
- \$200,555 to TNT;
- \$48,209 to TC&Co.; and
- \$295,339 to Horizon Establishment (account no. 6140000595 maintained at RBC Centura)

Also, on August 22, 2005, the TC&Co. bank account received a \$500,000 from an Arlington, Texas investor. On the same day, the investor's funds were transferred to Horizon Establishment's account no. 6140000595 maintained at RBC Centura and then, on August 23 and August 24, 2005, the funds were disbursed from Horizon Establishment's account to various investors.

33. I also reviewed Net Worth Group's account at Wachovia (number 2000026177520) from its opening on June 3, 2005 through September 30, 2005. During the first week after the account was opened, the transactions listed below demonstrate the multiple inter-bank transfers between and among TNT and Net Worth Group.

- June 3, 2005 – Net Worth received a wire transfer in the amount of \$1 million, from an investor;
- June 6, 2005 – Net Worth wire transfers \$905,000 to TNT;
- June 7, 2005 – Net Worth received another wire transfer in the amount of \$1 million from the same June 3rd investor;
- June 8, 2005 -- TNT wire transfers \$600,000 back to Net Worth Group and Net Worth Group wire transfers another \$500,000 to TNT;
- June 9, 2005 – TNT wire transfers \$500,000 to Net Worth Group and Net Worth Group wire transfer \$400,000 to TNT.

Between June and September 2005, Net Worth Group's account deposited approximately \$15 million. After subtracting the \$4.66 million transferred from TNT, Net Worth Group received approximately \$10 million in new investor funds. Of these funds, over \$5.6 million was transferred to Horizon Establishment's account at RBC Centura, and \$3.3 million was wire transferred to TNT. Once transferred to Horizon Establishment and to TNT, the funds are commingled with new investor funds and paid to current investors as investment returns. Net Worth Group appears to have disbursed the remaining \$1.1 million to investors as investment returns.

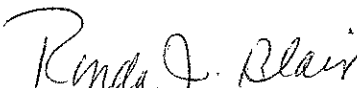
34. Finally, I determined that the some of the investor funds deposited in the TNT account and to the Correll controlled accounts were paid, for unknown reasons, to numerous persons and entities, including payments to the relief defendants named in this matter. Between July 2004 and October 2005, Banner Shield LLC, a company controlled by Gowdey received nearly \$450,000 from TNT. Also, between July 2004 and October 2005, from TNT and from bank accounts controlled by Correll Hospitality Management Group, Inc. received over \$3.8 million; Creative Wealth Management LLC received over \$2.6 million; JTA Enterprises received over \$2.1 million.

Ongoing Activities

35. The fraudulent activities connected with the World Bank program appear to be ongoing. After the World Bank programs ceased paying monthly returns to investors, Correll, Thompson, Johnson, Gowdey and Midkiff have engaged in a series of lulling statements. As stated in the Declarations of Moody and Wixom, such lulling statements include: that the Commission has frozen the bank accounts during the registration process and that the funds are being held by the banks due to the Patriot Act. Correll assured Moody that his principal was safely deposited at the Royal Canadian Bank ("RBC"). In reality, Correll has accounts at one of RBC Centura's Atlanta, Georgia

branches. Additionally, in my discussions with Wachovia, Net Worth Group's account has deposited approximately \$100,000 between November 16 and November 22, 2005.

Executed December 6, 2005



Ronda J. Blair

DECLARATION OF TRAVIS E. CORRELL

I, Travis E. Correll, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct, and further that this declaration is made on my personal knowledge and that I am competent to testify as to the matters stated herein:

1. My name is Travis E. Correll. On or about November 4, 2005, I was served with a subpoena issued by the staff of the United States Securities and Exchange Commission, Fort Worth District Office ("FWDO") in the matter of DM Marketing Services Inc. ("DM Marketing") (FW-02997). A copy of this subpoena is attached as Exhibit "A". The subpoena required my appearance at the FWDO for testimony on November 22, 2005. My testimony date was rescheduled, pursuant to a request from the FWDO staff, for November 18, 2005.

2. I hereby assert my privilege against self-incrimination under the Fifth Amendment to the United States Constitution and decline to answer any question that will be posed to me during the testimony pursuant to the FWDO subpoena attached as Exhibit "A", other than to identify myself as Travis E. Correll.

I, Travis E. Correll, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on 17th of Nov., 2005.

Travis Correll

TRAVIS E. CORRELL

SUBSCRIBED AND SWORN TO BEFORE ME this 17th day of November 2005, to certify which witness my hand and official seal.

Suzanne Pittard Shapiro

Notary Public

My commission expires: Feb 10, 2009



**UNITED STATES OF AMERICA
SECURITIES AND EXCHANGE COMMISSION
FORT WORTH, TEXAS REGIONAL OFFICE**

In the Matter of DM Marketing Services, Inc. : FW-02997
: :
: :
: :

**DECLARATION OF GREGORY W. THOMPSON ASSERTING FIFTH
AMENDMENT RIGHT AGAINST SELF-INCRIMINATION**

I, GREGORY W. THOMPSON, hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct, that I am at least twenty-one years of age, and that I am competent to testify as to the matters stated herein:

1. The United States Securities and Exchange Commission has served upon me a summons and subpoena (“Subpoena”) in the above styled matter, and a notice of sworn deposition and appearance.

2. Upon advice of counsel, I hereby assert my privilege against self-incrimination under the Fifth Amendment to the United States Constitution and decline to testify or provide an accounting, and, until further notice from me, will continue to decline to testify, provide an accounting or produce certain documents related to the matters set forth in the Commission’s Subpoena, including without limitation, testimony or documents regarding the following:

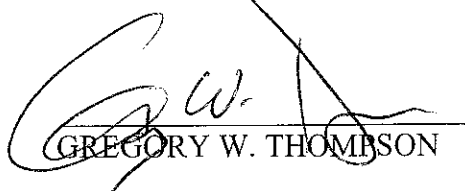
A. My personal background including, but not limited to, questions concerning family members, education, training, professional licenses, employment history, disciplinary history, criminal record and any civil actions in which I was or am a witness, a defendant, or a respondent;

Exhibit 2
Blair

- B. My personal assets, including, but not limited to, questions concerning any bank, brokerage, trust or any other financial accounts, as well as any entities, domestic or foreign, in which I hold a beneficial interest or over which I exercise discretionary control;
- C. Some of the conduct related to Horizon Establishment, and some of its control persons, officers, directors, managers, employees and agents, including, but not limited to, the solicitation of persons alleged to be investors under an alleged offering and sales of interests in what the Commission has asserted to constitute a high yield investment program;
- D. Some communications with persons or entities identified in the Subpoena
- E. Some receipt of funds, directly or indirectly from Horizon Establishment, or any entity or persons affiliated with any entity named in the caption, above;
- F. Some payments of funds or other things of value made directly or indirectly to Dan Moody, Travis Correll, or to any entity or persons affiliated with any entity named in the caption, above.
- G. Some transfers of funds to an entity or individual whether located within or outside of the Continental United States.

I, GREGORY W. THOMPSON, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on the 9TH day of November 2005.


GREGORY W. THOMPSON

UNITED STATES OF AMERICA
SECURITIES AND EXCHANGE COMMISSION
FORT WORTH, TEXAS REGIONAL OFFICE

In the Matter of DM Marketing Services, Inc.

FW-02997

**DECLARATION OF HARRY ROBINSON "ROBBIE" GOWDEY ASSERTING
FIFTH AMENDMENT RIGHT AGAINST SELF-INCRIMINATION**

I, HARRY ROBINSON "ROBBIE" GOWDEY, hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct, that I am at least twenty-one years of age, and that I am competent to testify as to the matters stated herein:

1. The United States Securities and Exchange Commission has served upon me a summons and subpoena ("Subpoena") in the above styled matter, and a notice of sworn deposition and appearance.

2. Upon advice of counsel, I hereby assert my privilege against self-incrimination under the Fifth Amendment to the United States Constitution and decline to testify or provide an accounting, and, until further notice from me, will continue to decline to testify, provide an accounting or produce certain documents related to the matters set forth in the Commission's Subpoena, including without limitation, testimony or documents regarding the following:

A. My personal background including, but not limited to, questions concerning family members, education, training, professional licenses, employment history, disciplinary history, criminal record and any civil actions in which I was or am a witness, a defendant, or a respondent;

Exhibit 3
Blair

- B. My personal assets, including, but not limited to, questions concerning any bank, brokerage, trust or any other financial accounts, as well as any entities, domestic or foreign, in which I hold a beneficial interest or over which I exercise discretionary control;
- C. Some of the conduct related to Horizon Establishment, and some of its control persons, officers, directors, managers, employees and agents, including, but not limited to, the solicitation of persons alleged to be investors under an alleged offering and sales of interests in what the Commission has asserted to constitute a high yield investment program;
- D. Some communications with persons or entities identified in the Subpoena
- E. Some receipt of funds, directly or indirectly from Horizon Establishment, or any entity or persons affiliated with any entity named in the Subpoena;
- F. Some payments of funds or other things of value made directly or indirectly to Dan Moody, Travis Correll, or to any entity or persons affiliated with any entity named in the caption, above.
- G. Some transfers of funds to an entity or individual whether located within or outside of the Continental United States.

I, HARRY ROBINSON "ROBBIE" GOWDEY, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on the 9 day of November 2005.

HARRY ROBINSON GOWDEY
HARRY ROBINSON "ROBBIE" GOWDEY

**UNITED STATES OF AMERICA
SECURITIES AND EXCHANGE COMMISSION
FORT WORTH, TEXAS REGIONAL OFFICE**

In the Matter of DM Marketing Services, Inc.

FW-02997

**DECLARATION OF DWIGHT J. JOHNSON ASSERTING
FIFTH AMENDMENT RIGHT AGAINST SELF-INCRIMINATION**

I, DWIGHT J. JOHNSON, hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the following is true and correct, that I am at least twenty-one years of age, and that I am competent to testify as to the matters stated herein:

1. The United States Securities and Exchange Commission has served upon me a summons and subpoena (“Subpoena”) in the above styled matter, and a notice of sworn deposition and appearance.

2. Upon advice of counsel, I hereby assert my privilege against self-incrimination under the Fifth Amendment to the United States Constitution and decline to testify or provide an accounting, and, until further notice from me, will continue to decline to testify, provide an accounting or produce certain documents related to the matters set forth in the Commission’s Subpoena, including without limitation, testimony or documents regarding the following:

A. My personal background including, but not limited to, questions concerning family members, education, training, professional licenses, employment history, disciplinary history, criminal record and any civil actions in which I was or am a witness, a defendant, or a respondent;

APP.17

Exhibit 4
Blair

- B. My personal assets, including, but not limited to, questions concerning any bank, brokerage, trust or any other financial accounts, as well as any entities, domestic or foreign, in which I hold a beneficial interest or over which I exercise discretionary control;
- C. Some of the conduct related to Horizon Establishment, and some of its control persons, officers, directors, managers, employees and agents, including, but not limited to, the solicitation of persons alleged to be investors under an alleged offering and sales of interests in what the Commission has asserted to constitute a high yield investment program;
- D. Some communications with persons or entities identified in the Subpoena
- E. Some receipt of funds, directly or indirectly from Horizon Establishment, or any entity or persons affiliated with any entity named in the Subpoena;
- F. Some payments of funds or other things of value made directly or indirectly to Dan Moody, Travis Correll, or to any entity or persons affiliated with any entity named in the caption, above.
- G. Some transfers of funds to an entity or individual whether located within or outside of the Continental United States.

I, DWIGHT J. JOHNSON, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on the 9th day of November 2005.


DWIGHT J. JOHNSON



UNITED STATES OF AMERICA
SECURITIES AND EXCHANGE COMMISSION

ATTESTATION

I HEREBY ATTEST
that:

A diligent search has this day been made of the records and files of this Commission and the records and files do not disclose that any application for registration, notification of exemption, notification of registration, or registration statement, has been received in this Commission, under the names Horizon Establishment; Travis Correll & Co., Inc.; The Net Worth Group, Inc.; TNT Office Supply, Inc.; Jericho Productions; Atlas; Atlas LLC; Atlas LLC Blue Sky; Banner Shield LLC; or Banner Shield LLC Blue Sky, pursuant to the provisions of any of the Acts administered by this Commission.

~~on file in this Commission~~

November 21, 2005
(Date)

Larry Mills
Records Officer

It is hereby certified that the Associate Executive Director, Office of Filings and Information Services, U.S. Securities and Exchange Commission, Washington, D.C., which Commission was created by the Securities Exchange Act of 1934 (15 U.S.C. 78a et seq.) is official custodian of the records and files of said Commission, and all records and files created or established by the Federal Trade Commission pursuant to the provisions of the Securities Act of 1933 and transferred to this Commission in accordance with Section 210 of the Securities Exchange Act of 1934, and was such official custodian at the time of executing the above attestation, and that he/she, and persons holding the positions of Deputy Director, Associate Directors, Special Assistant to the Director, Records Officer, Branch Chief of Records Management, and the Program Analyst for the Records Officer, or any one of them, are authorized to execute the above attestation.

For the Commission

Jonathan G. Katz
Secretary

