

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Mag. No. 10-MJ-71 (DWF/FLN)

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In Re Search Warrants of February 23,  
2010, and Later Days

**SUPPLEMENTAL DECLARATION  
OF MARK J. KALLENBACH**

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Mark J. Kallenbach, Esq. makes the following sworn declaration pursuant to 28 U.S.C. § 1746 to supplement his March 25, 2010 Declaration [Docket 48] and to address Special Agent Nathan Price's April 2, 2010 Affidavit [Docket 50] concerning V-Media Marketing, LLC's Premier Bank, Minnesota account ending in XXXX6099 ("Premier Bank Account").

*Special Agent Nathan Price's April 2, 2010 Affidavit [Docket 50]*

- (1) The facts set forth in Special Agent Price's April 2, 2010 Affidavit [Docket 50] regarding V-Media Marketing, LLC's Premier Bank Account appear to be true and correct in all material respects.
- (2) V-Media Marketing, LLC borrowed all of the funds that were deposited to its Premier Bank Account.

*IMC Desperately Needs Working Capital To Pay Its Creditors*

- (3) On April 5, 2010, I attended a webcast sponsored by one of IMC's marketing consultants ("April 5<sup>th</sup> Meeting")
- (4) At the April 5<sup>th</sup> Meeting, I learned, amongst other things, that many of iNetGlobal's new customers have demanded refunds.

- (5) The number of customers seeking refunds and the amount of such refunds is unknown. What is known is that as each and every day passes, without iNetGlobal being in business as usual, more of iNetGlobal's customers will seek refunds.
- (6) I also learned that iNetGlobal's marketing consultants are clamoring for commission payments that are legitimately due and owing to them. iNetGlobal has been unable to pay the commissions.
- (7) At the time I signed my March 25, 2010 Declaration, I believed it to be true that iNetGlobal had no unrestricted cash meaning cash available for working capital. I have since learned that as a result of negotiations in which I was involved, on March 22, 2010 iNetGlobal netted approximately \$220,000 from the return of restricted cash. As of the time my March 25, 2010 Declaration was prepared, I was unaware that this money had been returned to iNetGlobal.
- (8) After my Declaration was signed, approximately \$795,000 of restricted cash was made available to iNetGlobal for working capital after close of business on March 25, 2010.
- (9) As of today, iNetGlobal's unrestricted cash is approximately \$1,015,000. I arrive at this sum by adding \$220,000 and \$795,000 to reach \$1,015,000.
- (10) January 31, 2010 is the last time that iNetGlobal prepared financial statements. At that time, iNetGlobal owed approximately \$13.2 million to creditors. As of today, without the benefit of current financial statements, it is my best estimate that the company owes approximately \$13.2 to \$15 million to its creditors.

- (11) If \$15 million were to be released to iNetGlobal, it is my best estimate that most, if not all, of iNetGlobal's creditors could be paid, with approximately \$11.1 million of liquid unrestricted cash remaining in the government's hands.

I have made this declaration pursuant to 28 U.S.C. § 1746. I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 7, 2010

s/ Mark J. Kallenbach, Esq.  
Mark J. Kallenbach, Esq.