

EXHIBIT A TO ORDER

AFFIDAVIT OF CHRISTOPHER J. BRUMMER

)
DISTRICT OF COLUMBIA ss:
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Christopher J. Brummer, being duly sworn, states the following.

1. My name is Christopher J. Brummer, and I served as a member of the Financial Industry Regulatory Authority ("FINRA") National Adjudicatory Council (the "NAC") from 2013 to 2015. I am a law professor at Georgetown University Law Center, and have held no other positions at FINRA.
2. At no time before or after Mr. Benjamin Wey's indictment in September 2015 did I represent to FINRA, the SEC, NASDAQ, any government agency, agent or investigator, nor did I conclude, that Mr. Wey, his firm New York Global Group ("NYGG") or attorney Robert Newman:
 - i. Violated any federal securities laws or stock market rules;
 - ii. Caused any payment of \$350,000 to any retail brokers in New York;
 - iii. Created artificial demand for securities by working directly or indirectly with a hand-picked team of retail stock brokers to solicit purchases of one or more issuers' securities on behalf of retail customers without disclosing a large kickback paid to the brokers;
 - iv. Sold large blocks of nominee-held shares into the artificially created public demand;
 - v. "Engaged in market manipulation," was a "stock promoter", paid a "bribe" to anyone or pressured any market participants to buy or sell stock in any issuer.
3. After Mr. Wey's indictment, the only communications that I have had with anyone concerning Mr. Wey have been in the context of the allegations detailed in my lawsuit (Brummer v. Wey, Supreme Court of the State of New York, Index No. 153583/2015).
4. During my tenure as a NAC member, my responsibility was to review FINRA hearing panel decisions alongside other NAC members. In this capacity, I (along with Charles Senatore) participated in a NAC subcommittee that reviewed and made a preliminary recommendation concerning the FINRA Hearing Panel Decision Re: Complaint No. 2009019108901: *Department of Enforcement v. William Scholander and Talman Harris* (the "FINRA Hearing Panel Decision"). Following that preliminary recommendation, the matter was submitted to the full NAC Panel for review, comment, revisions and, ultimately, a vote. The full NAC Panel voted in favor of affirming the FINRA Hearing Panel's findings and the December 29, 2014 NAC Decision Re: Complaint No.

2009019108901: *In the Matter of Department of Enforcement v. William Scholander and Talman Harris* was issued.

5. I did not make any of the factual findings set forth in the FINRA Hearing Panel Decision by the FINRA Hearing Panel dated August 16, 2013. Again, I have never made any findings of fact or made any written statement to FINRA, the SEC, NASDAQ, any government agency, agent or investigator that Mr. Wey, NYGG or Robert Newman engaged in the conduct specified in Section 2(i)-(v) above.
6. Although I participated in the NAC's review of the FINRA Hearing Panel Decision, I did not draft, review or comment on any briefs filed with the SEC or other government agencies relating to the FINRA Hearing Panel Decision (to the extent that any such briefs exist). Specifically, if there are statements in any such briefs concerning Mr. Wey, Robert Newman or NYGG, including, without limitation, any statements that Mr. Wey or Mr. Newman was responsible for promoting stock, or attempting to manipulate, or actually manipulating, the price of any stock, I did not write them. Again, I only reviewed the factual findings of the FINRA hearing panel. Neither the full NAC Panel on which I served, nor my NAC Subcommittee, undertook to make any factual findings concerning the matters at issue in the FINRA Hearing Panel Decision apart from those determined by the FINRA hearing panel itself.
7. Other than reviewing the factual findings of the FINRA hearing panel, I have no independent personal knowledge of the activities of Mr. Wey (this does not include facts I have learned about Mr. Wey's activities in the context of my lawsuit, *Brummer v. Wey*).
8. FINRA has paid the legal fees incurred on my behalf in the *Brummer v. Wey* case.
9. I have testified herein to the best of my recollection. I will accept service of a subpoena from Mr. Wey for testimony in future legal proceedings, provided that any such subpoena is delivered to my counsel, Daren Garcia, Vorys, Sater, Seymour and Pease LLP, 500 Grant Street, Suite 4900, Pittsburgh, Pennsylvania 15219, and I will testify truthfully if thus served with such a subpoena.

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Further affiant sayeth naught.

Christopher J. Brummer

Sworn to before me and subscribed in my presence on August ___, 2018.

Notary Public