

# **EXHIBIT 1**

522185

785975 ARTI \$50.00 RAVE 2 5/5/16

**ARTICLES OF INCORPORATION  
OF  
TIN MOON CORPORATION**

TO THE SECRETARY OF STATE OF THE STATE OF IOWA:

Pursuant to *Code of Iowa* §490.202 of the *Iowa Business Corporation Act*, the undersigned, acting as incorporator of a corporation, adopts the following Articles of Incorporation for the corporation:

**ARTICLE ONE – NAME OF CORPORATION**

The name of the corporation is TIN MOON CORPORATION.

**ARTICLE TWO – DATE OF INCORPORATION**

The date of corporate existence shall commence on the date of the filing of these Articles with the Secretary of State of the State of Iowa.

**ARTICLE THREE – PURPOSE**

The purpose for which this corporation is organized is the transaction of any lawful business for which corporations may be organized under the *Iowa Business Corporation Act*.

**ARTICLE FOUR – STOCK**

This corporation shall have the authority to issue 1,000 shares of common stock.

**ARTICLE FIVE – REGISTERED AGENT**

The street address of the initial registered office of the corporation is 1400 University Avenue, Suite D, Dubuque, IA 52001. The name of the registered agent at said address is Benjamin J. Roth.

**ARTICLE SIX – BOARD OF DIRECTORS**

The number of directors constituting the initial board of the corporation is two. The names and addresses of the persons who shall serve as directors of the corporation until the first annual meeting of shareholders are:

Rod Blum, 2728 Asbury Road, Suite 400, Dubuque, IA 52001 and  
Ed Graham, 2728 Asbury Road, Suite 400, Dubuque, IA 52001.

4

#### ARTICLE SEVEN – BY-LAWS

The initial By-Laws of the corporation shall be adopted by its Board of Directors. The power to alter, amend, or repeal the By-Laws or adopt new By-Laws shall be vested in the Board of Directors.

#### ARTICLE EIGHT – RESTRICTIONS ON TRANSFER OF SHARES

A. If any two or more shareholders or subscribers of stock of the corporation shall enter into any agreement abridging, limiting, or restricting the rights of any one or more of them to sell, assign, transfer, mortgage, pledge, hypothecate, or transfer on the books of the corporation, any or all of the stock of the corporation held by them, and if a copy of said agreement shall be filed with the corporation; or

B. If the incorporator or the shareholders entitled to vote shall adopt any By-law provisions abridging, limiting or restricting the aforesaid rights of any shareholders, then and in either of such events, all certificates of shares of stock subject to such abridgements, limitations, or restrictions shall have a reference thereto endorsed thereon by an officer of the corporation, and such stock shall not thereafter be transferred on the books of the corporation except in accordance with the terms and provisions of such agreement or By-law, as the case may be.

#### ARTICLE NINE – DIRECTOR LIABILITY

A director of this corporation shall not be personally liable to the corporation or its shareholders for monetary damages for breach of fiduciary duty as a director, except for liability for:

- A. Any breach of its director's duty of loyalty to the corporation or its shareholders;
- B. Acts or omissions not in good faith or which involve intentional misconduct or a known violation of law;
- C. Any transaction from which the director derived an improper personal benefit;
- D. The amount of a financial benefit received by a director to which the director is not entitled;
- E. An intentional infliction of harm on the corporation or its shareholders;
- F. A violation of *Code of Iowa* §490.833;
- G. An intentional violation of criminal law.

#### ARTICLE TEN – LIMITATION OF PERSONAL LIABILITY

Consistent with *Code of Iowa* §504.901, the private property of the directors, officers, employees, members, and volunteers of the corporation shall be exempt from all debts, obligations and liabilities of the corporation of any kind whatsoever and directors, officers, employees, members, and other volunteers of this corporation shall not be personally liable in that capacity, for a claim based upon an act or omission of the person performed in the discharge of the person's duties, except for a breach of the duty of loyalty to the corporation, for acts or omissions not in good faith or which involve intentional misconduct or knowing violation of the law, or for a transaction from which the person derives an improper personal benefit. If Iowa law is hereafter

changed to mandate or permit further elimination or limitation of the liability of the corporation's directors, officers, employees and volunteers, then the liability of the corporation's directors, officers, employees and volunteers shall be eliminated or limited to the full extent then permitted by law.

In addition, a director, officer, or member shall not be liable to the corporation for any money damages for any action taken, or any failure to take any action, as a director, except liability for any of the following:

- The amount of any financial benefit received by the person to which he/she is not entitled;
- A. An intentional infliction of harm on the corporation or its members;
  - B. A violation of *Code of Iowa* §504.835;
  - C. An intentional violation of criminal law.

#### ARTICLE ELEVEN – INDEMNIFICATION

This corporation may indemnify a director or officer of this corporation, to the fullest extent possible against expenses, including attorneys' fees, judgments, penalties, fines, settlements, and reasonable expenses, actually incurred by such director or officer relating to his/her conduct as a director or officer of this corporation, except that the indemnification required by this sentence shall not apply to:

- A. Receipt of any financial benefit(s) to which a director or officer is not entitled;
- B. An intentional infliction of harm by the director or officer on the corporation or its members;
- C. A violation of *Code of Iowa* §490.833;
- D. Intentional violation of criminal law;
- E. Against judgments, penalties, fines, and settlements arising from any proceeding by or in the right of the corporation, or against expenses in any such case where such director or, officer shall be adjudged liable to the corporation.

Any indemnification provided for in this Article (unless ordered by a court) shall be made by the corporation only as authorized in the specific case upon a determination that indemnification of the director or officer is proper in the circumstances because the director or officer had met the applicable standard of conduct set forth in this Article above. Such indemnification shall be made: (1) By the Board of Directors by a majority vote of a quorum consisting of directors who were not parties to such action, suit or proceeding; or (2) by special legal counsel, selected by the Board of Directors by vote as set forth in (1) above, or, if the requisite quorum of the full Board cannot be obtained therefor, by a majority vote of the full Board, in which selection directors who are parties may participate; or (3) by the shareholders.

The indemnification provided in this Article shall not be deemed exclusive of any other rights to which a person indemnified may be entitled under any Bylaw, agreement, vote of shareholders, or disinterested directors or otherwise, both as to action in the official capacity of such

person and as to action in another capacity while holding such office, and shall continue as to a person who has ceased to be a director or officer and shall inure to the benefit of the heirs, executors, and administrators of such person.

ARTICLE TWELVE – PRE-EMPTIVE RIGHTS

After the first shares of the corporation's authorized shares have once been issued, each holder of shares in this corporation shall have the first right to purchase shares of this corporation that may, from time to time, be issued (whether or not presently authorized), including shares from the treasury of this corporation, in the ratio that the number of shares he holds at the time of issue bears to the total number of shares outstanding, exclusive of treasury shares. This right shall be deemed waived by any shareholder who does not exercise it and pay for the shares pre-empted within thirty (30) days of receipt of a notice in writing from the corporation stating the prices, terms, and conditions of the issue of shares and inviting him to exercise his pre-emptive rights.

The By-Laws may contain any provision restricting the transfer of shares of any classification of stock authorized and issue by this corporation. In addition, the shareholders may enter into any agreement between or among themselves and the corporation restricting the transfer of shares.

ARTICLE THIRTEEN – INCORPORATOR

The name and address of the incorporator of this corporation is: Benjamin J. Roth, 1400 University Avenue, Suite D, Dubuque, IA 52001.

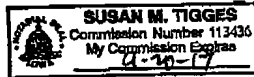
Dated this 3rd day of May, 2016.

Benjamin J. Roth  
Benjamin J. Roth

STATE OF IOWA, DUBUQUE COUNTY :SS:

On this 3rd day of May, 2016, before me, the undersigned, a Notary Public in and for said state, personally appeared Benjamin J. Roth, to me known to be the same person who signed the above instrument and acknowledged the same to be his voluntary act and deed.

Susan M. Tigges  
Notary Public, State of Iowa



FILED  
IOWA  
SECRETARY OF STATE  
5-3-16  
12:04pm 4  
W01045694

# **EXHIBIT 2**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

**Transcript of Interview of GetMePlacement, LLC President  
OCE Review 18-2049  
May 22, 2018**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: Okay. Speaking is Helen Eisner. This is May 22nd, 2018. I am here with  
2 Deputy Chief Counsel Paul Solis. This is Review 18-2049. We are here  
3 with GetMePlacement, LLC President (“GMP President”).

4 GMP President: [GMP President]. It's fine.

5 Helen Eisner: Pronounced [GMP President]. Okay.

6 GMP President: That's okay.

7 Helen Eisner: We have given [GMP President] a copy of the False Statements Act. He  
8 has signed the acknowledgement form, and I think we can go ahead and  
9 get started. Just some basic background questions to begin with. Where do  
10 you currently work?

11 GMP President: I work at Get Me Placement, is the company name.

12 Helen Eisner: What is your role for Get Me Placement?

13 GMP President: I'm the President of the company.

14 Helen Eisner: What is Get Me Placement?

15 GMP President: We are a search engine marketing company. We also teach people how to  
16 get into this business. Some people think it's odd that we're creating  
17 competitors, but there are so many websites that need help or need fixing  
18 to be able to be found on the front page of the search engines, Yahoo,  
19 Google, and Bing, that we could certainly never call them all or help them  
20 all, and so we have started, about 10 years ago, teaching people our trade,  
21 if you will, and helping them get started in this business, which is exactly  
22 what has happened with Tin Moon.

23 Helen Eisner: We will certainly get into that in a little more detail.

24 GMP President: I'm sure we will.

25 Helen Eisner: 10 years ago, you started teaching people this. Is that when the company  
26 started?

27 GMP President: No, we actually started as an organization ... We still have our same head  
28 tech. We started in 1998, and under a different name, but again, same  
29 organization. I think, as a company called Get Me Placement, I think it  
30 was 2004 is when we actually formed that.



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: Besides Get Me Placement, are you employed by any other companies?
- 2 GMP President: No, ma'am.
- 3 Helen Eisner: Okay. You talked generally about Get Me Placement and what it does,  
4 what its goal is as a business, but what types of services and products does  
5 Get Me Placement offer?
- 6 GMP President: We offer internet placement. Typically, we would be focused on helping  
7 people that are currently advertising to be found online, or participating in  
8 what's called AdWords. If you do a search for something, up at the top,  
9 those people are paying for those ads. We are helping those people stop  
10 paying for those ads and get them in what's called the organic listings in  
11 the middle of the page, which is where over 80% of the people click. We  
12 also do web development. We also host websites, and then we, again, will  
13 teach people this business.
- 14 Helen Eisner: Part of the process is teaching people the business, and then there's the  
15 AdWords component, and advertisement. Is that something that you do in-  
16 house, or is there a product that you provide to people?
- 17 GMP President: There's no product that we would provide. It's strictly a service that we  
18 provide, in what I call, in very simple terms, fixing their website. With  
19 every sale, if you will, every client, we will add new pages to the client's  
20 website, so that's part of our process. Whether we have our own clients, or  
21 whether what we call ... Someone that has purchased our software  
22 licensing agreement, or SLA, we call them an affiliate, just so that we're  
23 all on the same page. If I use the word affiliate, you'll know what I mean.  
24 Tin Moon is an affiliate. In addition to teaching them all of our  
25 methodologies, we will also provide them with the ability to hire us to do  
26 the technical work, so a large part of what we do is helping our affiliates  
27 perform the optimization work, for clients that they have gone and sold,  
28 and they're collecting the money. They're their clients. Those clients don't  
29 even know who I am, or Get Me Placement is, but we are doing the  
30 technical work.
- 31 I think that's important for you guys to ... I'm glad you asked, to  
32 understand in some of the original, we'll call it dust that got kicked up  
33 about the Tin Moon and their advertising and that kind of thing. If they're  
34 a brand new company, how could they have helped 10,000 clients? You  
35 know, that kind of thing. What should have been clarified on Tin Moon's  
36 part is that they utilize a tech team that has that kind of experience, which  
37 I think spelled it out fairly clearly. Hopefully I did. I certainly attempted to  
38 in my response back to you guys, that we can provide, and a lot of times  
39 do provide, at least for a certain time frame. It varies. It's up to the affiliate

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 to be able to decide ... I always do this, when they want to cut the  
2 umbilical cord and break free from us, because it's their business. We've  
3 taught them everything they need to know, but some of them, they want to  
4 stay close to us, and allow us to do the technical work, and all they have to  
5 focus on are sales.

6 Helen Eisner: That make sense. That's really helpful. The term that you used, both in  
7 email to me, and you just used, software licensing agreement, the way  
8 you've explained it to us just now, it seems like there's sort of technical  
9 support and training, but is there an actual software that is exchanged, a  
10 piece of software?

11 GMP President: It's web-based. Yes, ma'am. It is web-based. Each affiliate gets their own  
12 licensed copy that they can use, and I believe that this particular one  
13 would have tinmoontracker.com, or something like that, and so everyone  
14 receives a licensed copy of the software, but you're absolutely right.  
15 Training, mentorship, coaching, technical support, and then use of the  
16 software that we developed ourselves.

17 Helen Eisner: How many affiliates does Get Me Placement have?

18 GMP President: We have 91 affiliates.

19 Helen Eisner: Okay. One of the components you just talked about has to do with  
20 updating affiliates' websites and working on their websites. I'm just going  
21 through these documents. This is a page of the website that I pulled last  
22 week, which is the Updating My Website portion of the Get Me Placement  
23 website. I'm sure you are very familiar with this, but I'll just provide you a  
24 copy of it. If you could explain to us, what does it mean to update one of  
25 these affiliates' websites? What are the steps that you go through?

26 GMP President: What I'm referring to here is, in updating a site, there's two things that are  
27 important. There's visibility, like you want to be able to be found. You  
28 want people to actually see your website, and then also, conversions,  
29 meaning people come to your site. Are they taking any action? Are they  
30 taking the next step? Are they picking up the phone and calling you? Are  
31 they filling out a form to send you an email? That kind of thing. As it  
32 states here, "What good would it do if we were to bring you five times  
33 more traffic, if people simply get to your site and they say, 'Oh, this looks  
34 awful,' and they reach up and they click their back button with their mouse  
35 or their track pad?" It is important that people update their site so that it is  
36 meeting the needs of their visitors, is what this is describing.

37 Helen Eisner: What is that process? As far as, there's a new affiliate that comes on board,  
38 how do you go about ... I mean, you've talked about the goals of visibility

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 and conversions, but what does Get Me Placement do with a new affiliate,  
2 as far as updating the website?
- 3 GMP President: This, Helen, is geared toward what I would call an end user. This would  
4 not be geared toward an affiliate, for example. We will launch, as part of  
5 the software licensing agreement, as I've provided a copy for you guys ...  
6 It includes that we will build them a website, and for Tin Moon, we built  
7 them a website. After the launch of the website, it's their website. I'm not  
8 saying this like it's a bad thing. It's their website. They can do with it  
9 whatever they want to and in Tin Moon's instance, they did. Other  
10 affiliates have gone on to change their website. We just get them started, if  
11 you will, with a website. I don't recall an instance, ever, that we've gone  
12 in, and we have gone in and changed an affiliate's website after the initial  
13 launch. Perhaps we have, but I'm not aware of it if we have, so they may  
14 go take and go, "You know what? This was fine to get started with,  
15 because I wanted to get started quickly in this business, but now I want a  
16 better, bigger, more robust, beautiful website," and they'll go hire someone  
17 and go do it on their own.
- 18 Helen Eisner: Eventually, the affiliate takes ownership and control over the content that's  
19 on the website, but initially, Get Me Placement will do the build out, as far  
20 as ... Is that correct?
- 21 GMP President: That's fair. That's a good way to put it. They take immediate ownership of  
22 it, yeah. As soon as we build it, I mean, it's theirs. It's got their name on it,  
23 and they own the domain name. Now, we may host it for them as a  
24 courtesy, but that's not the norm. Usually, it's hosted by them somewhere  
25 else, and we just provide them with something to get started with.
- 26 Helen Eisner: For all clients, all affiliates, do you build from a template, or is it  
27 customized? How does that work?
- 28 GMP President: Typically, it's a template. We will use templates that we have purchased  
29 from a company called Elegant Themes, and we direct the affiliate to look  
30 at those templates and choose one from their ... So, they're WordPress  
31 template-based.
- 32 Helen Eisner: It's template-based, and the affiliate has some ability to choose different  
33 types of content that will be used. Is that a fair ...
- 34 GMP President: Sure. Absolutely, and in every instance, they will provide us with logos,  
35 pictures, anything like that that they want on their site. They provide that  
36 to us.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: Getting into some more specifics, Ed Graham. Who is he, and what is your  
2 relationship with him?
- 3 GMP President: Ed, as I understand it, is an owner in Tin Moon, and an owner in Digital  
4 Canal, and I'm not certain of his title. I think he's the President. That  
5 would be my educated guess, that he's the President of the companies. He  
6 is the one that I have had 99% of contact to. In my response, I said there  
7 was a gentleman, I've never heard of his name, and he's on their website. I  
8 don't know who that person is. There's a video of him. I don't know who  
9 he is or what function he provides. I have had contact. The young lady that  
10 brought you downstairs, Monique? Monique and I went up to their offices  
11 to train them, and Ed was in training, and Monty ... I think Alexander is  
12 his last name ... was in training, and then there was another gentleman that  
13 I think he is no longer with the company.
- 14 Helen Eisner: Do you remember his name?
- 15 GMP President: I want to say it was Paul, but I don't recall.
- 16 Helen Eisner: Just so I'm clear, when you're talking about you went up there, and met  
17 with them, are you talking about Digital Canal, or Tin Moon, or how are  
18 you differentiating between the two?
- 19 GMP President: That's a good and a fair question. As I reflected in my response back to  
20 you, Tin Moon is who sent us a check, and that's who paid for this joint  
21 agreement, which is an unusual situation. In fact, I can't think of another  
22 instance where this has happened this way, where a company pays for the  
23 cost of the software license, which is identified in the agreement, but they  
24 also paid for services as well, and the services were for digitalcanal.com,  
25 and digitalcanalstructural.com. When we went up there, I'd have to say,  
26 Helen, in all fairness, I would think that we went up there to help them  
27 have a better understanding of Digital Canal's services that they  
28 purchased, but I think, again, easily, the main purpose of the trip was for  
29 Tin Moon's training.
- 30 Helen Eisner: When was that trip?
- 31 GMP President: I don't have the exact dates, but August of 2016.
- 32 Helen Eisner: Okay. All right. There's a lot to break apart, so let me just go through a  
33 few more background questions. As far as Ed Graham, you said you had  
34 about 99% of the contact related to these companies was him. How did  
35 you first come to meet Ed Graham?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 GMP President: That's a great question, and I'm not certain. We did not reach out to them.  
2 You know, Ed Graham ... I do know. Let me start over. Ed Graham found  
3 an ad that was placed by a broker of ours for this business opportunity was  
4 available, and Ed reached out to the broker, and then they talked about the  
5 opportunity of the business, if you will, and then Ed and I connected at the  
6 broker's exchange of, "Here's [GMP President]'s information, and [GMP  
7 President], here's Ed's information," and then we spoke by telephone.
- 8 Helen Eisner: Do you know approximately, was that in 2016? What time period?
- 9 GMP President: It was. I would say it was probably in the March time frame. They didn't  
10 sign up immediately, as I recall, and then we prepared the agreement in  
11 early May, so March, April of '16.
- 12 Helen Eisner: From that point forward, how often do you communicate with Ed  
13 Graham?
- 14 GMP President: Since that time? After the initial training that we went up there in August  
15 of '16, I don't recall having any conversations with Ed for several months,  
16 until they started actively selling for Tin Moon.
- 17 Helen Eisner: When was that, when they started actively selling for Tin Moon?
- 18 GMP President: April of '17.
- 19 Helen Eisner: Just a few more background questions. What is your relationship with  
20 Congressman Rod Blum?
- 21 GMP President: I don't have one at all. I've never met him. I've never spoken to him. I've  
22 never corresponded with him. I would have to say it's at zero.
- 23 Helen Eisner: What is your knowledge of his involvement with either Digital Canal or  
24 Tin Moon?
- 25 GMP President: Of course, I've not seen any documentation of ownership or titles or  
26 anything like that, but the impression that I have from Ed is that he is more  
27 of a financial partner, and not necessarily an active partner. Now, that's my  
28 impression. Rod may come to work every day, and if he does, I'm not  
29 aware of it. When I was there, he was not in the office, and I was there for  
30 two and a half days, and he was not in the office, so I never met him.
- 31 Helen Eisner: What was it that gave you the impression he was more of a financial  
32 partner?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 GMP President: Just the way that Ed spoke of him. Ed did mention originally, in our early  
2 conversations, that a U.S. Congressman was involved or would be  
3 involved in the business, and to what extent, he didn't say and I didn't ask.  
4 I don't know, maybe from something I've seen online, that he is a majority  
5 owner. I think I saw, read, and again, who knows whether it's true or not,  
6 that he's a 70% owner, but Ed never shared that with me. I have no direct  
7 knowledge from Ed or anyone at Digital Canal or Tin Moon or anything,  
8 anybody there, of Mr. Blum's ownership interest, percentage, or daily  
9 function, if any. I have no idea, because I've never, ever spoken to him,  
10 and I've talked to Ed a bunch of times.
- 11 Helen Eisner: One thing I just want to clarify, when we're talking about him being a  
12 financial partner or that he might have a certain percentage ownership, are  
13 you talking Tin Moon or are you talking about Digital Canal?
- 14 GMP President: My impression would be both. Yeah, both. Again, I've only been there  
15 once, but not ever having had a conversation or the opportunity to meet  
16 Mr. Blum, or correspond with him, I just don't know. The way that Ed  
17 referred to him is that he was a partner, but it appeared that Ed ran the  
18 business.
- 19 Helen Eisner: Now, just focusing in on Digital Canal, what is your understanding of that  
20 business and what they do?
- 21 GMP President: They are a company that provides software to builders and designers, and  
22 other than that, that's really about all I know.
- 23 Helen Eisner: Prior to March 2016, when you said approximately that was the time  
24 period for when Ed Graham reached out to you, was there any type of  
25 relationship between Get Me Placement and Digital Canal, prior to March  
26 2016?
- 27 GMP President: No, ma'am. None whatsoever. The initial contact was regarding the  
28 business opportunity through the broker.
- 29 Helen Eisner: Now, just isolated again to Digital Canal, what is the business relationship  
30 between Digital Canal and Get Me Placement?
- 31 GMP President: I would say that it is reflective on our agreement with them that I shared  
32 with you. I would say that it would be reflective there. They are seeking  
33 internet visibility for Digital Canal and digitalcanalstructural.com.
- 34 Helen Eisner: Is that the only agreement that exists between Get Me Placement and  
35 Digital Canal?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: Yes, it is.

2 Helen Eisner: Yes, okay. Why don't we get into that agreement? I'll provide you a copy  
3 of that, and we can start talking about it. Here you go.

4 GMP President: Thank you.

5 Helen Eisner: I'm sure you're familiar with it, but for the record, this is TM\_0009  
6 through TM\_0014. Those are just numbers that help us identify what  
7 documents we're talking about for the transcript. The first portion of the  
8 agreement seems to focus on Digital Canal, and the first sentence really  
9 says, "Thank you for selecting ... " And this is addressed to Ed Graham for  
10 Digital Canal Corporation and Tin Moon Corporation. "Thank you for  
11 selecting getmeplacement.com to optimize your website." I know you've  
12 talked to us about Get Me Placement and what their goal is when working  
13 with affiliates, but if you can describe to us what it means here, to  
14 optimize their website, what the goal of this contract was.

15 GMP President: Just for your understanding and clarification, this would be the language  
16 that we would typically have a separate agreement for, for what we would  
17 call an end user, not an affiliate, but what they are contracting us to do is  
18 to optimize or fix, and in layman's terms, fix their website so that they  
19 would appear better and be more relevant for keyword phrases in the  
20 major search engines, Google, Yahoo, and Bing, and that is what this is  
21 referring to. Of course, it tells us here in the agreement what we're going  
22 to focus on.

23 Helen Eisner: You talked earlier about training that took place. Would any portion of  
24 this contract related to Digital Canal involve that type of training or  
25 software license?

26 GMP President: It would not. Yeah, it would not.

27 Helen Eisner: That's what you mean when you're saying typically, this would have been  
28 an end user agreement rather than the affiliate type of structure?

29 GMP President: Yeah, that's correct. Again, I do not recall us entering into an agreement  
30 like this ever before, but this is how they would like for it to be structured,  
31 and I didn't see that it was a problem.

32 Helen Eisner: Why was it that they wanted it to be structured this way?

33 GMP President: I don't recall, and I'm not sure. I know that they wanted it tied together,  
34 and why, I don't recall why it was. I do recall, Helen, that there was an  
35 original discussion about it just being to Ed Graham and Digital Canal,

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 and then, at Ed's request, that we change it and add Tin Moon Corporation  
2 to it.

3 Helen Eisner: When you said tied together, earlier, you meant tied together in that  
4 Digital Canal and Tin Moon were both incorporated into the agreement? Is  
5 that what you mean?

6 GMP President: That's what I meant by that, yes, ma'am, that they wanted one agreement,  
7 "Let's put it together as one agreement instead of two separate  
8 agreements."

9 Helen Eisner: I'm looking at page ... it's stamped as 0010, towards the bottom, the second  
10 page of that packet, talking about pricing. Since this was an unusual  
11 arrangement, tying those two together, how did that affect pricing for  
12 Digital Canal in this portion of the agreement?

13 GMP President: Just totally separate. Again, it was as if they were two separate  
14 agreements, talking about the corporate optimization, and then after that,  
15 this is solely for the optimization work. Not for the training and the  
16 software license and all of that.

17 Helen Eisner: I see.

18 GMP President: That's not what that paid for.

19 Helen Eisner: The prices here ... I see the 50,000 for initial optimization work, and then a  
20 non-refundable deposit of 15,000, totaling 65,000, and then it says, "DCC,  
21 Digital Canal Corporation, will owe a balance of 86,875." How did that  
22 sum come out of the 65,000? Just trying to understand this in the context  
23 of the agreement as a whole, but getting those numbers.

24 GMP President: That's a good question. That's the total amount of money that they paid for  
25 everything. We combined the pricing for the software license along with  
26 the work, so the total combined that they paid was the 65, plus the 86,875.

27 Helen Eisner: This was in addition, so Digital Canal owed both the 65 and the 86,875?

28 GMP President: Yes. Yes, and I do recall that the money that we received from them was a  
29 check from Digital Canal. It didn't say Tin Moon on the check. It's my  
30 understanding that Tin Moon was not even formed yet. When I referred to  
31 talking to Ed originally about the agreement, that it didn't have Tin Moon  
32 on it, I recall that the name Tin Moon had not even been established yet,  
33 so it would be highly unlikely that it would have already been a  
34 corporation established at that point.



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: This final agreement does use the name Tin Moon, so at some point during  
2 that negotiation process, Tin Moon was incorporated?
- 3 GMP President: At least that the name was chosen, because not too far prior to this, the  
4 name of the company that was going to be selling the search engine  
5 optimization services had not been decided upon. I mean, maybe they got  
6 a two- or three-day corporation set up or something. I don't know, but I  
7 know just prior to this, Helen, that the name had not even been finalized or  
8 determined or whatever. Under the pricing, because there's no other place  
9 on this agreement that talks about ... Well, no, there is two, here on 12.
- 10 Helen Eisner: Yeah, I mean, if we look at 0012, and I do want to talk about Tin Moon in  
11 general-
- 12 Paul Solis: It's also on 11. It's on 11 as well.
- 13 Helen Eisner: ... but there are different places in the agreement, I think the main sections  
14 being that pricing section on the second page of the agreement, talking  
15 about DC, so Digital Canal, and then the fourth page of the agreement  
16 starts to talk about Tin Moon and what they owe as a part of the  
17 agreement. I realize it's a little confusing because they are tied together.
- 18 GMP President: I remember that it was a crazy, laborious task to put this together because  
19 it was so confusing. It would have been so simple just to have two  
20 separate agreements. "Let's have an agreement for Digital Canal for the  
21 optimization work, and then let's have another one for the software license  
22 agreement," but again, they wanted it this way. I'm trying to remember,  
23 and I'm also trying to think of maybe why that was, and I think maybe  
24 because it was Digital Canal that paid for everything.
- 25 Helen Eisner: I just want to make sure I understand, because I think earlier, a few  
26 minutes back, you said that Tin Moon had paid for everything, and then  
27 you said Digital Canal.
- 28 GMP President: Oh no. If I did, that was a mistake. No, no, no. I remember very clearly,  
29 Digital Canal is who paid, and I want to say they paid in two checks, and  
30 each time, they were Digital Canal checks. They did not, for clarity, did  
31 not have Tin Moon on them. Yeah, Digital Canal.
- 32 Helen Eisner: These were corporate checks, not personal checks?
- 33 GMP President: Correct.
- 34 Helen Eisner: How far apart were those two checks received, approximately?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: Well, one check was received pretty quickly after the agreement, and then  
2 I think the balance of the money was in the June-July time frame, and then  
3 we had training in August.

4 Helen Eisner: I'm going to just table this for a second and talk a little bit about Tin  
5 Moon, and then we'll come back to this.

6 Paul Solis: Quickly, who signed the checks? Was it Mr. Graham?

7 GMP President: I don't know. I'd have to contact the bank, I guess, to see if they can go  
8 back and go see, but I don't remember that.

9 Paul Solis: Just whatever you recall.

10 GMP President: Sure, sure, yeah. I appreciate that, but yeah, no, I don't remember. I just  
11 don't remember who signed it, but I do remember it was Digital Canal,  
12 without hesitation.

13 Helen Eisner: You've talked a little bit about Tin Moon's goal in this agreement being  
14 somewhat different as far as taking on that affiliate status, but what is Tin  
15 Moon? What is their business model?

16 GMP President: Tin Moon's business model is seeking new clients that they can help  
17 improve their search engine relevance, and get those businesses' websites  
18 on the front pages of the major search engines.

19 Helen Eisner: What types of clients are they seeking?

20 GMP President: All types of clients. Typically, of course, they're going to have websites,  
21 but they're, again, people that would be participating in the AdWords up at  
22 the top of the search engines, and helping them stop paying those high  
23 prices and get onto the front page of the search engines. I mean, whether  
24 it's a service provider or someone that sells products, we would typically  
25 focus on people that would provide a service of some kind, any kind.  
26 Roofing, plumbing, paper shredding, a doctor, a dentist, they provide  
27 services, so it would be anyone like that.

28 Helen Eisner: Is there a particular industry that Tin Moon was focused on? Roofing,  
29 plumbing. Was there an industry that they-

30 GMP President: No, because the leads that we would send them that are included in the  
31 agreement, and which are referenced here on one of these pages, we're  
32 going to give them leads, 5,000 sales leads. Those are just simply  
33 businesses that are paying per click, so it could be anything. Now, it's my  
34 understanding that Monty did reach out to a number of Digital Canal's

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 existing clients, which I would fully support. If you have a name and a  
2 phone number, and a relationship with those people, call them and ask  
3 them, "You're not on the front page of Google. Would you like to be? I did  
4 some Yahoo searches and Bing searches, and I can't find you. Would you  
5 like to be on the front page?" Sure, do it.
- 6 Helen Eisner: What is Monty Alexander's role with Tin Moon?
- 7 GMP President: He's a sales representative, and he is also a sales representative for Digital  
8 Canal, so he works for both companies, which is my experience with him.  
9 When we went up for training, he was with, and had been there for a  
10 while, had been with Digital Canal, and then he was going to start selling  
11 SEO. It's my understanding that he doesn't do it ... Tin Moon, he doesn't  
12 do it full-time, it's just ... I don't know. I don't know what causes him to  
13 switch hats. Day of the week, hour of the day, I don't know, but he still, as  
14 I understand it, he still works for both.
- 15 Helen Eisner: What is your understanding of how much, percentage-wise, of his time he  
16 spends at Tin Moon versus Digital Canal?
- 17 GMP President: I know in a typical setting, I'm not supposed to guess, but I feel like this is  
18 not a typical setting, so my guess is that he would focus the majority of his  
19 time on Digital Canal.
- 20 Helen Eisner: What are you basing that on?
- 21 GMP President: The limited conversations that I've had with him in the last year, very  
22 limited, and that he's not really focused on this. When I say this, I mean  
23 Tin Moon. I don't feel like that he's devoting that much time to it.
- 24 Helen Eisner: What was the reason you had those conversations?
- 25 GMP President: One instance was that he had a Digital Canal client that wanted a new  
26 website, and that was one of the few conversations I've had with him.  
27 Then recently, he had sold a client a few months ago. He and I have not  
28 spoken, as I responded in my deal. He and I have not corresponded  
29 directly, but I understand from speaking with Ed that Monty has sent a few  
30 emails to this client of Tin Moon's.
- 31 Helen Eisner: Emails pertaining to-
- 32 GMP President: A Tin Moon client.
- 33 Helen Eisner: Pertaining to their website?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 GMP President: Yes, their website, and more specifically, to their optimization.
- 2 Helen Eisner: When would he have sent those emails, approximately? Time frame?
- 3 GMP President: Recently. In the last 30, 45 days.
- 4 Helen Eisner: Besides Monty Alexander and Ed Graham, and you mentioned an  
5 individual named Paul who was at a training, what other employees or  
6 officers of Tin Moon are you aware of?
- 7 GMP President: None. I mean, I've called and some nice person answered the phone, but I  
8 don't know who they were. Officers was your question? I'm not aware of  
9 any.
- 10 Helen Eisner: Or employees.
- 11 GMP President: Or employees, yeah, I'm not aware of any.
- 12 Helen Eisner: You've talked about this, but let's just get it for the record specifically.  
13 What is the business relationship between Tin Moon and Get Me  
14 Placement?
- 15 GMP President: They purchased a ... Well, I say they. I mean, it depends on how technical  
16 you get. Digital Canal purchased a software license for Tin Moon through  
17 Get Me Placement.
- 18 Helen Eisner: As far as you, yourself, what role have you played for Tin Moon besides  
19 your role for Get Me Placement?
- 20 GMP President: For Tin Moon, coach and mentor for any questions that they have  
21 regarding any potential clients, any potential resellers, and any issues that  
22 they have with their clients. Ed, I think because he is an older gentleman,  
23 as I am, is somewhat of an older school, and prefers to call me with any  
24 issues, as opposed to any of the more than capable folks that you saw  
25 upstairs. Our other affiliates, we'll typically reach out to them, and if they  
26 have any questions or issues or whatever, but Ed typically will just reach  
27 straight out to me, and that's okay. I don't mind.
- 28 Helen Eisner: The website for Tin Moon currently lists you as Chief Technology Officer  
29 and Director, SEO Activity and Research. What is that position and title,  
30 and how are you involved in the company as it relates to that title?
- 31 GMP President: In my response, I hope that I was crystal clear. I have an issue with  
32 whether ... And I'm not an attorney. You'll have to help me with that, but I  
33 am not the first title. What did you say it was again?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: Chief Technology Officer.
- 2 GMP President: Yeah, any C-level type thing, I feel like that person is part of that  
3 company. I think that's the impression that it gives, and that is not  
4 accurate. That is something that we discussed, and that I had an issue with.  
5 There was another thing on their website that I had a tremendous issue  
6 with, and it was, they put a Google-certified partner logo in my little  
7 boxed area, and I am not. I am Google-certified from taking and passing  
8 two tests, but I'm not a certified partner because I felt like they were  
9 extorting \$10,000. They said, "Now that you've passed the test, we would  
10 like for you to prove your knowledge and spend \$10,000 on AdWords,"  
11 and I'm like, "Why didn't you say this in the beginning, or I wouldn't have  
12 taken those two, three-hour long tests, each of them?" When I told you  
13 there was a phone call, that was the subject of that phone call, was that  
14 that was not accurate and that needed to be removed immediately, and it  
15 was.
- 16 Helen Eisner: That was a phone call with Mr. Graham?
- 17 GMP President: Yes. Yes, exactly.
- 18 Helen Eisner: When was that phone call?
- 19 GMP President: I think I stated it in the deal. I think it was ...
- 20 Helen Eisner: About February ...
- 21 GMP President: February 26th? Yes.
- 22 Helen Eisner: Yes.
- 23 GMP President: Yes, that's it.
- 24 Helen Eisner: Okay, that's the call that you were referring to.
- 25 GMP President: That's the call.
- 26 Helen Eisner: At this point, when this information was added, both the Google-certified  
27 logo and your title and biography on the website, was that a point when  
28 Digital Canal ... Well, I'm sorry, when Tin Moon had taken back that  
29 control over the content of the website?
- 30 GMP President: Helen, I'm not sure. I don't know when it was changed. They didn't reach  
31 out to us, and I tried to convey that. It is their website, but when it  
32 involves me and what my accreditations are and/or my titles, I don't know

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1                   when that was changed. It was not changed with our ... I want to be fair  
2                   here. It's not like they have to ask our permission to change their site.  
3                   They didn't ask permission to change it. I felt like they should have asked  
4                   me. I'm okay with any affiliate saying that I'm their Director of SEO, to  
5                   help them get started with their new business, because we are doing the  
6                   technical work, but I feel like it's a misrepresentation, if you will, that I'm  
7                   their Chief Technology Officer, because again, that sounds like I'm an  
8                   owner in the business, or I'm certainly a corporate title-holder in the  
9                   business, and I feel like that's misleading, and I expressed that to Ed.

10   Helen Eisner:        Do any of the templates that Get Me Placement works from provide a  
11                   biography of you and list you as Director of SEO Activity?

12   GMP President:      No, ma'am. There are a few out on the internet like that, but it is not part  
13                   of the template, I promise you. If they ask, then I'm okay with it. If they  
14                   say that I'm their head SEO guy, or I'm their Director of SEO, I don't have  
15                   a problem with that at all, because they're using us to do their technical  
16                   work, but it is not part of the template.

17   Helen Eisner:        Bringing it back to Tin Moon, how successful has Tin Moon been?

18   GMP President:      My general impression is that it hasn't been something that they have  
19                   focused on. As I recall, they don't have very many clients, and that's  
20                   another impression that I have about Monty, about how much time he  
21                   spends on Tin Moon. I think it's very limited. People that we have trained  
22                   in the past, and that do focus on obtaining new clients, typically do very  
23                   well. I mean, it was months into 2017, whatever that is ... seven, eight  
24                   months after training, before they even obtained their first client. That's  
25                   very unusual. Typically, it happens within the first month or two, so I just  
26                   don't feel like that it was something that they focused on in 2016.

27   Helen Eisner:        You said that happened approximately April 2017?

28   GMP President:      Mm-hmm (affirmative).

29   Helen Eisner:        Since that time, how many clients are you aware of that they've obtained?

30   GMP President:      I would guess that they have maybe six clients.

31   Helen Eisner:        What is that based on?

32   GMP President:      The number of clients that they've entered into their software. I could gain  
33                   access to it and go log in and look, and I could tell you and not guess, but I  
34                   feel like that's their business, and just because I can go look, I could look  
35                   at it, but I don't think I'm supposed to. That's the way I feel like it. I feel

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1                   like it's their business, and they can charge whatever they want to charge,  
2                   and all those things. It's their business. If they want to offer a discount,  
3                   they can offer a discount. I could go look, and I could go see the date that  
4                   someone signed up, and go look and see how many there are. I just haven't  
5                   done that.

6   Helen Eisner:           Every time they get a new client, it's logged, so that would be the basis.

7   GMP President:         Yes, ma'am. That'd be the proof, yeah. I can't imagine that they would  
8                   ever, ever sign someone up and not put it in their system.

9   Helen Eisner:           What's your impression, at this point ... I mean, you said approximately six  
10                   clients. Are they still actively seeking new clients?

11   GMP President:         I would assume so. I haven't been told that they have ceased. They don't  
12                   sign up clients very often, and so it doesn't seem to be a priority for them  
13                   to focus on this, and I don't know what that reason is. I do know that on  
14                   several occasions, since beginning our relationship with Ed, I shared with  
15                   him, a lot of our affiliates will reach out to a web developer, and create a  
16                   relationship with the web developer where the web developer can refer  
17                   business. There were a number of instances where Ed felt like he had  
18                   found a good resource for that, and then I think ultimately, out of the few  
19                   times maybe that's happened, two, three times, that I recall, it didn't work  
20                   out.

21                   I keep giving you the impression that they're not really focused on it. Ed  
22                   did reach out to me I would say early this year, and requested potentially  
23                   we work on, or at least consider finding someone together, maybe letting  
24                   me help him find someone, maybe around here, because there's not a  
25                   whole lot of business in Dubuque, Iowa, and so maybe in the North Texas  
26                   area, maybe I could help him find someone. I mean, they are thinking  
27                   about it, and that's what tells me, again, that I feel like that they're still  
28                   interested in this, but it's not something I think they wake up and think  
29                   about like the other affiliates do.

30   Helen Eisner:           When they find a new client, what is the charge for that client to have  
31                   access to their services?

32   GMP President:         It's published on their website, depending on what level of service that  
33                   client chose.

34   Helen Eisner:           What is your knowledge of that?

35   GMP President:         It varies. It can be as low as \$6,000 to start, and \$599 per month, up to  
36                   tens of thousands of dollars to start.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: As far as the six clients that you're aware of, do you know where they fall  
2 in that range?
- 3 GMP President: I think that they fall in what we would call a level 10 category, that are  
4 typically \$10,000 to start, and then \$999 per month. Again, the six is a  
5 guess. It could be four, but I think it's somewhere in that range.
- 6 Helen Eisner: Let's go back to the agreement and talk about this a little bit more. We  
7 talked about the first portion as far as optimizing the Digital Canal  
8 website, and then on page three, which is TM\_0011, it says at the top,  
9 "Double Corporate Level 25 and Software License Agreements." Can you  
10 explain to us what that entails?
- 11 GMP President: The top line?
- 12 Helen Eisner: The, "Double Corporate Level 25 and Software License Agreements."
- 13 GMP President: The, "Double Corporate Level 25," I just referred to the level 10, so  
14 Digital Canal purchased two level 25s. It's also in the reference, Helen, on  
15 the first page, or TM\_0009, under the reference, "Level 25 opt,"  
16 abbreviated for optimization number one, "Digital Canal. Level 25  
17 optimization number two, digitalcanalstructural.com," and then back to  
18 page 11 that you referred to at the top, in bold, "And Software License  
19 Agreement." That's what is the SLA, we abbreviated to call it, and that's  
20 what Digital Canal purchased for Tin Moon to operate under.
- 21 Helen Eisner: Further down on that page, there's a list of seven different products that  
22 are included. Those are the products, and correct me if I'm wrong, that Tin  
23 Moon would have access to as part of this executed agreement.
- 24 GMP President: That's correct.
- 25 Helen Eisner: On the next page, TM\_0012, let's again look at that pricing section and  
26 just see if we can make sense of it. What I see is, "Tracker system  
27 software license and training is offered for a cash discounted price of  
28 \$130,000." There's also a deposit for \$15,000, and a special affiliate price  
29 of \$50,000. It's a total amount of \$151,875, but the amount of \$65,000 will  
30 be credited. To make sense of this, does that help you understand maybe  
31 the Digital Canal portion of the pricing any further, as far as what this  
32 agreement meant?
- 33 GMP President: As I recall, the total amount that they paid was \$151,875.
- 34 Helen Eisner: The \$65,000 will be credited off the total amount ... On page two of the  
35 agreement, it seems that the total cost of the products, the services, really,



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 I guess, offered to Digital Canal is \$65,000. Was the \$65,000 credited off  
2 of the \$151,875 that represented the value of Tin Moon's portion of the  
3 agreement?
- 4 GMP President: I believe that's correct. Let me grab my calculator. I think that's correct.  
5 It's funny how I can remember going through this back and forth, thinking,  
6 "Oh my gosh. Is this right?"
- 7 Helen Eisner: Yeah, and I think just looking at it, I want to make sure that we understand  
8 the math.
- 9 GMP President: Yes, I would say that that is accurate, that \$65,000 would have been  
10 applied to the ... Actually, 15 of that was also part of the software, so I  
11 would say, from looking at this, that \$50,000 of this was for the  
12 optimization work for the two websites, basically \$25,000 each.
- 13 Helen Eisner: Is this combining the pricing that was listed earlier for Digital Canal, in  
14 addition? I'm looking at what looks like a tracker system software license  
15 of at least \$130,000 for Tin Moon, and the non-refundable deposit, so let  
16 me try to break this down. The value of what Tin Moon received, was that  
17 \$151,875 as far as the value, maybe not what was actually paid, but the  
18 value of what they received through the agreement?
- 19 GMP President: You know, it is still confusing. I do believe that they paid a total of  
20 \$151,875, but the license does have a value of \$130,000, which means,  
21 then, that you'd have to look at the difference of the technical work, if you  
22 will, back for the Double Corporate Level 25, would simply be \$21,875.  
23 We can look at this. I know you guys aren't familiar with this, but let's  
24 look at this and see. On the level 25, if you look at page ... Please turn to  
25 page 13. At the top of the page, about the middle of the first paragraph,  
26 level 25 is \$10,000. Do you see that?
- 27 Helen Eisner: Yes.
- 28 GMP President: There's two of those, so that's \$20,000, and then there's a content cost in  
29 addition to that, which would have brought the price up to the \$21,875.  
30 Although it's not reflective here, super clear, the value of the work for  
31 Digital Canal was \$21,875.
- 32 Helen Eisner: That was the value of the work for Digital Canal, specifically.
- 33 GMP President: And Digital Canal Structural, split 50/50.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: The remaining portion, if you subtract the \$21,875 from the \$151,875,  
2 you're getting the \$130,000, which is the license and training, or which is  
3 the software license.
- 4 GMP President: I would say that's fair, yes.
- 5 Helen Eisner: Were there other reductions, the non-refundable deposit, that were made  
6 because of the nature of the agreement?
- 7 GMP President: I don't recall. I believe that they just made two fairly substantial payments.  
8 It seems like we got \$65,000, and it seems like we got \$86,875.
- 9 Helen Eisner: Understood, and those were the two payments that were made that then  
10 totaled \$151,875.
- 11 GMP President: Right.
- 12 Helen Eisner: Again, those are the payments that you talked about earlier that were made  
13 from Digital Canal.
- 14 GMP President: Correct.
- 15 Helen Eisner: Looking at this page 12, 0012, there are some upgrades that are listed, and  
16 on the next page, there's a discussion of ongoing costs. Were there any  
17 additional upgrades or ongoing costs that Tin Moon accrued?
- 18 GMP President: Not as of this time, no.
- 19 Helen Eisner: The only payments that had been made related to Tin Moon reflect that  
20 \$151,875, the \$130,000 portion.
- 21 GMP President: That would not be accurate. We have added some new pages recently for  
22 Digital Canal and Digital Canal Structural. There's actually going to be a  
23 third website. I think it's Digital Canal Estimating, I think, and Ed did  
24 visit, not with me on that, but with Matt in our office, about that. I think  
25 we have charged them, Digital Canal, we have charged them a few  
26 thousand dollars for that work.
- 27 Helen Eisner: Those were some additional charges for Digital Canal. What about for Tin  
28 Moon?
- 29 GMP President: No.
- 30 Helen Eisner: No.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: None. No upgrades and no ongoing cost stuff, no. Just strictly with Digital  
2 Canal changes.

3 Helen Eisner: Do you know why Digital Canal paid on behalf of Tin Moon?

4 GMP President: No.

5 Helen Eisner: One of the products in the list of seven products on page 11, and it's the  
6 last product, page seven, is, "Build template-based site for Tin Moon,  
7 optimized for 95 to 100% for Iowa, Illinois, and Wisconsin." What was  
8 the process as far as working with Tin Moon to build out their website?

9 GMP President: What we described early on in the conversation, you'd asked about was it  
10 a template site, that kind of thing, we would have shared with them for  
11 them to go take a look at elegantthemes.com and pick a template, tell us  
12 what colors they want, blues or reds or greens, whatever color they want,  
13 and then we would build a basic site with very similar services that we  
14 offer at Get Me Placement, and that would be their starter website, if you  
15 will.

16 Helen Eisner: Who were you working with from Tin Moon?

17 GMP President: Ed.

18 Helen Eisner: Ed. You had provided me, and thank you for this, a copy, an original  
19 screenshot, of Tin Moon's website, which I believe is from July 2016.

20 GMP President: Correct.

21 Helen Eisner: That is what the file is saved as.

22 GMP President: Right, right. It is.

23 Helen Eisner: Was this a screenshot that you had saved for your files, or where did this  
24 come from?

25 GMP President: Yes, thank you. Yes, it was saved, and we also have ... Our head tech  
26 saves these in case somebody accidentally overrides their website, so we  
27 have this in its original state. Sorry. Whatever site, whether it's an affiliate  
28 site or an end user client site, or whatever, we'll save those. We still have  
29 this.

30 Helen Eisner: What we're looking at from July 2016, is this reflective of a template that  
31 Get Me Placement would have built?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 GMP President: Yes, it is.
- 2 Helen Eisner: Yes. In this template, towards the bottom there, is a video box. You can't  
3 see any image from the video there, but at the top, it says, "John Ferland,  
4 on behalf of Digital Canal."
- 5 GMP President: That's that guy I don't know who it is. They must have provided that. That  
6 is not something that we would provide. When we ask for logos and  
7 pictures and things like that, they must have sent that to us for us to put on  
8 their site. I don't know who that person is. I really don't. I don't know if he  
9 works there, or if he works somewhere else. I haven't even watched the  
10 video. I don't know who it is or what it is, but they provided that to us, so  
11 it is not a standard template item.
- 12 Helen Eisner: What conversations were there about including this video on the website?
- 13 GMP President: None that I recall. It would have likely been a conversation with someone  
14 that works here, at the company, because I don't have any recollection of  
15 ever talking about a video, or this John Ferland, I guess is how you  
16 pronounce his last name. I had zero involvement in this piece. They would  
17 have sent it to someone that works here. Until I saw that, I didn't know  
18 that it was even there.
- 19 Helen Eisner: Here's a copy of the current website, and this is from the Tin Moon's ...  
20 And we're moving through quickly. We don't have too much more to go.  
21 This is the Tin Moon's Success Stories page for their current website. You  
22 can see that there's a list of five success stories, I guess, to the left, with  
23 different names. Where did this information come from?
- 24 GMP President: That came from the training manual that we provided them.
- 25 Helen Eisner: You provided to Tin Moon?
- 26 GMP President: To Tin Moon.
- 27 Helen Eisner: Did they place this information on the website, or is that something that  
28 Get Me Placement included in the website?
- 29 GMP President: I believe they put that on here.
- 30 Helen Eisner: What was your knowledge of them using this information?
- 31 GMP President: I was not aware of it. I mean, they had the information, like the graphic  
32 over on the right. That's in the training manual as well, but I had no  
33 knowledge or any information prior to them doing this.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: What is this graphic on the right?
- 2 GMP President: The graphic on the right describes the difference ... Well, there looks like  
3 one graphic, but it's actually two. The first top graphic describes the  
4 difference between an organic visitor to your website and a paid traffic  
5 visitor, and it describes that the organic visitor stays on the site. The first  
6 column is, "They view over twice as many pages," the middle column is,  
7 "The organic visitor to your site is going to stay over three times longer,  
8 and their propensity to immediately bounce off your website is some 35%  
9 less." It's part of our value proposition, that we're not only going to bring  
10 more traffic to you, but it's better traffic.
- 11 Helen Eisner: Go ahead.
- 12 GMP President: Sorry. The bottom part describes a client of ours, of Get Me Placement's,  
13 that, "They also participate in PPC," which stands for pay-per-click, which  
14 is the ads at the top, and then they also are paying us \$3,000 per month,  
15 and then over, as you move from left to right, it describes what they are  
16 paying per click for their cost through the ads, is \$2.21, and their cost per  
17 click through our program is 11 cents a click, and then how many clicks or  
18 hits did they get to their website for that \$3,000, pretty much dollar for  
19 dollar spend, they got 1,363 from their paid ads, and they got 27,000 plus  
20 on the organic.
- 21 Helen Eisner: Has this graphic been edited from the one that is in the manual at all?
- 22 GMP President: I don't believe so, no. I think it's exactly what's in the manual.
- 23 Helen Eisner: The portion, just the left bottom corner where it says, "TML charges."
- 24 GMP President: Oh. That has been edited. You're right, because that would not be in there.
- 25 Helen Eisner: What is TML? Is that Tin Moon Labs?
- 26 GMP President: That would be Tin Moon Labs. Yeah, it sure has. Good eye. I missed that.
- 27 Helen Eisner: Is this accurate information about Tin Moon Labs?
- 28 GMP President: I would say it is not accurate. I would say that it could be representative of  
29 that, but that is not a Tin Moon client. That is a Get Me Placement client.  
30 That's a good eye. I did not see that, but that's ... I don't like that,  
31 personally. This is totally out of nowhere, but I do have a high regard for  
32 Ed Graham. I think he's a real gentleman, but some of the things that they  
33 had done with this ... And I know you said we're almost finished, but the

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 reputation management thing, totally out of line. Totally out of line. Don't  
2 know where it came from. We didn't have anything to do with it.

3 Yes, we do reputation management, and we help people with things that  
4 are, "I got a false rip-off report," kind of thing. You can read all about that  
5 on our website. We helped that company, and it turned out to be a  
6 disgruntled employee. The CTO thing, the FDA thing that they did, this, I  
7 think, is not accurate, in my opinion. Again, I think Ed is a really nice guy,  
8 and in my conversation with him, I told him I felt like that Monty had kind  
9 of taken the ball and literally run with it on some of these things. I think  
10 that's misrepresentative. I just do. Again, it hurts me to say that, but it's the  
11 truth.

12 Helen Eisner: What about your reaction to the use of these quotes?

13 GMP President: I think that it would be representative of this. Overall, Helen, I don't mind  
14 it, but what I would have preferred to see is that some type of identifier. I  
15 hate to use the word disclaimer, but maybe that's a decent word. Up here,  
16 it should say that, "This is representative of work from our tech team."  
17 Just be honest.

18 Helen Eisner: From the Get Me Placement?

19 GMP President: Don't mislead people thinking that this is what TML is getting from this  
20 prospective client or whatever. I just think that's misleading.

21 Paul Solis: When you say tech team, do you mean Get Me Placement?

22 GMP President: Us, yes.

23 Helen Eisner: Get Me Placement.

24 GMP President: Yes. "These are short testimonials from work that our tech team has  
25 performed." Something like that.

26 Helen Eisner: There's one quote, the Kristen W. quote, the third one down, that says,  
27 "Our pay pre click campaign spend was nearly 200,000, which made the  
28 switch to Tin Moon worth it by itself, but our traffic has increased at the  
29 same time." The word Tin Moon is used there.

30 GMP President: Yeah. I'm not aware of that testimonial. I don't know of a Kristen. I know  
31 of a Jeff and all of those, but I don't know of Kristen. That may be theirs. I  
32 don't know.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: There's a book that you just grabbed. If you could describe to us what  
2 you're-

3 GMP President: It's our training manual. I'm going to look and see. I think we've got those  
4 on our website as well. We don't go over these typically in training, so let  
5 me look and see if I can locate those. We can also pull up our website and  
6 see. I don't know who Kristen is. I know these other people, so that may  
7 be theirs.

8 Paul Solis: The other four you know?

9 GMP President: I do know Janie, and Jeff, and Gib, and Robert. I know all those people.

10 Paul Solis: Are they clients of Tin Moon?

11 Helen Eisner: Or affiliates?

12 GMP President: No, no, no. They're clients of ours. They are our clients. Here's this one  
13 graphic of the top, in the book.

14 Helen Eisner: And that is the identical graphic for the top portion, starting with 3.24,  
15 Organic Traffic.

16 GMP President: You're right. It has not been altered.

17 Helen Eisner: I'm just making sure for the recording that we have some description of  
18 that.

19 GMP President: What we're looking at, yeah. In our training manual, we don't have those.  
20 Those must be on our website. I would look. I don't know who Kristen is,  
21 but I know those other people, and I probably have their phone numbers in  
22 my phone, but I don't know who Kristen is. I'd have to say that that's  
23 theirs.

24 Helen Eisner: Let me ask you another question, show you another document. This is a  
25 website from a company called Web Edge Digital Marketing. Does Get  
26 Me Placement have a relationship with this company?

27 GMP President: We do, yes.

28 Helen Eisner: From this website, there's, again, a Success Stories tab-

29 GMP President: There's Kristen again.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: ... similar to the Tin Moon Success Stories tab that lists quotes from some  
2 of these identical individuals, including the Kristen W. quote. The quote  
3 appears almost identical, except there's the insertion-

4 GMP President: They changed their name.

5 Helen Eisner: ... to Web Edge, so it uses that company's name.

6 GMP President: Yeah. I don't know who Kristen is. Perhaps I've forgotten who Kristen  
7 was, but I'm going to find out real soon.

8 Helen Eisner: None of these quotes, and just correct me if I'm wrong, are part of the  
9 template provided by Get Me Placement, is that correct?

10 GMP President: That's correct.

11 Helen Eisner: This would have been the individual affiliate or company deciding to  
12 include this content on their website?

13 GMP President: Yes, because I don't know that anybody else has used this that I recall.  
14 Maybe there is. I don't know. I know it's not part of the template.

15 Paul Solis: The second page of Web Edge.

16 GMP President: Of this one? Oh, they're using it too?

17 Helen Eisner: You can see that it's the identical chart, and towards the bottom left-hand  
18 corner for Web Edge, corner, they have changed the name to Web Edge  
19 monthly charge.

20 GMP President: And they have done the same thing on Web Edge monthly charge. Yeah,  
21 I'm not okay with that.

22 Paul Solis: Again, these are both represented in your training manual.

23 GMP President: They're not. I'm sorry, these are, yes sir.

24 Helen Eisner: The chart portion.

25 GMP President: I just showed them to you.

26 Paul Solis: Not the client quotes, but the-

27 Helen Eisner: The chart portion.



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Paul Solis: ... the chart portion.

2 GMP President: These two chart portions are both in here, and we give our affiliates a  
3 digital copy of the manual, and they could have taken that out of there.  
4 What I'm concerned about-

5 Paul Solis: The intent there is for them to develop their own figures, correct? Not to-

6 GMP President: Yeah, here's this one here.

7 Helen Eisner: Which is that top chart portion starting with 3.24.

8 GMP President: Correct, and then the other one is ... Under expect ... No, it wasn't under  
9 Expectations. It was under Our Stories. Yeah, you can see, it says GMP.

10 Helen Eisner: GMP is in the manual, as in Get Me Placement.

11 GMP President: Yes, and so they've taken it and changed it, but I am fearful that someone  
12 went, Greg Simmons, has looked at ... Because this can and will happen.  
13 Someone says, "Can I look at a couple of other affiliates' websites and see  
14 which ones I like, because I'm really at a loss here. My creativity just  
15 doesn't exist, so can I look at a couple of other affiliates?" I think they may  
16 have said, and this is an educated guess, "I like the one for Tin Moon,"  
17 because he came along after they did, but I'm not okay with that.

18 Helen Eisner: Who is Greg Simmons?

19 GMP President: He's Web Edge, and he's in Florida. I'm going to ask who Kristen is. Have  
20 y'all looked at our website for these?

21 Helen Eisner: We have.

22 GMP President: I'm sure you have, and do you see these on our website?

23 Helen Eisner: There appear to be-

24 GMP President: Is there a Kristen W. on there?

25 Helen Eisner: That I can't tell you off the top of my head. I know that some of the quotes  
26 that appear there are on your website. I'm not sure that the Kristen W. one  
27 is there.

28 GMP President: Man, I don't know who that is. Like I said, I mean, I could have forgotten,  
29 but I have a decent memory. I just don't know who that is. That's a lot of

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 money. \$200,000 on a pay-per-click campaign. I think I would remember  
2 that.

3 Helen Eisner: That's not a quote that you've seen before.

4 GMP President: No, I don't recall seeing that, and again, I don't know who Kristen is, and  
5 it's troublesome that people are using that and then putting their name to it  
6 as if it was their client that did that. Again, I would want to see ahead of  
7 those some indication that, "Our tech team, this is the result of our tech  
8 team that we've partnered with," that kind of thing.

9 Helen Eisner: To the extent that Tin Moon does have at least a few clients that you are  
10 aware of, are you aware, or what knowledge do you have of Kristen W.  
11 being any of those clients that you've mentioned for Tin Moon?

12 GMP President: No knowledge, whether she is a client or is not. I'm not sure.

13 Helen Eisner: Additionally ... I'll give you a moment.

14 GMP President: That's okay. I'm listening. I'm just going to write down Kristen W. and  
15 find out if we can find out who that is. It may be their client, but I don't  
16 think it's ... It's just not someone that I recall.

17 Helen Eisner: There's one other Tin Moon web page that I want to show you. This is  
18 their About Us section. I think you mentioned this before. What I want to  
19 draw your attention towards is the logos at the bottom. Inc. 500, Fast  
20 Company, Softletter. There are a number of logos. What are those logos?

21 GMP President: No knowledge of it at all. It's not something that we are affiliated with,  
22 and it's something that they have simply added on their own. I don't even  
23 know. I mean, Inc. 500, but I'm not sure what that award is that they're  
24 showing. I don't even know who these companies are, Fast Company and  
25 Softletter. I don't know who they are or what they do. Again, that's not part  
26 of the template.

27 Helen Eisner: You had provided me with an email, and I'm just going to give you a copy  
28 of that. This is TM\_0001 through 0003. This is an email chain between  
29 yourself, and it says egraham@[REDACTED]. Can I assume that's Ed  
30 Graham?

31 GMP President: Yes.

32 Helen Eisner: Okay. On the last page, the third page, which is the first email in the chain,  
33 there's a back and forth, I think, that Ed Graham sent you an email, and

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 towards the end of the email, he says, "The team is kicking in our Tin  
2 Moon optimization next week, so that's exciting." What does that mean?

3 GMP President: As I recall, we made some changes to their optimization about what the  
4 focus was. The original focus identified in the agreement was an overall  
5 focus of Iowa, Illinois, and Wisconsin, and I think it was altered to have a  
6 different focus, geographically, around Dubuque and maybe another area  
7 or two. I'd have to look at the site to be able to see exactly what, look  
8 under the hood, so to speak, but that's what that's referring to.

9 Helen Eisner: So, "Kicking in the Tin Moon optimization," refers to changing the  
10 geographic focus.

11 GMP President: Correct.

12 Helen Eisner: He says, "The team is kicking in." Do you know what he means by the  
13 team, or who he means?

14 GMP President: I would assume that he meant the GMP team.

15 Helen Eisner: That would be the GMP Get Me Placement team.

16 GMP President: Correct, that we would be making those changes next week, so that's  
17 exciting.

18 Helen Eisner: Do you know why he wanted those changes to be made?

19 GMP President: As I recall, it was for local relevance for Monty's request to have better  
20 placement for their own website.

21 Helen Eisner: There's back and forth here about scheduling a phone call. Did that phone  
22 call eventually happen?

23 GMP President: It did.

24 Helen Eisner: Was that the February 26th phone call that you referred to earlier?

25 GMP President: It is.

26 Helen Eisner: What did you discuss during that phone call?

27 GMP President: We discussed the Tin Moon website, the title of the Chief Technology  
28 Officer, and what that implied, that I wasn't comfortable with it. We also  
29 talked about the horrible things that this blog lady was saying about how  
30 the company was, and I, "[GMP President] is a scam," and that kind of

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 thing. We also talked about the Google-certified partner was wrong, and  
2 that it needed to be removed, and it was removed.

3 Helen Eisner: It sounds like Mr. Graham was the one who set up the phone call. Was  
4 there something that he wanted to discuss with you? Anything related to  
5 the business?

6 GMP President: I think he also wanted to talk about, I guess, what had transpired about the  
7 lady that was blogging, and that kind of thing. Of course, I was already  
8 aware of it. I had gotten a phone call from the Associated Press, and I was  
9 already aware of what was going on, but I think he just wanted to, I guess,  
10 let me hear it from him, I guess, if you will.

11 Helen Eisner: Who was the lady that was blogging?

12 GMP President: I don't know her name. She had horrible things to say. Untruthful things. I  
13 almost said it. Bleeding Heartland, I think, is her site or her blog.

14 Helen Eisner: You discussed that blog, and also, you said, the Associated Press article.

15 GMP President: Yes, not necessarily the article in any kind of detail, just that the  
16 Associated Press has called.

17 Helen Eisner: What did Mr. Graham say about that?

18 GMP President: Not too different than what he put here, that it's just a bunch of crap, and  
19 that ... I don't remember if it was from the phone call or not, but just what  
20 was going on, and that Tin Moon didn't have any clients in 2016, and that  
21 Rod felt like that was the reason why it had no business, it had no clients,  
22 and that that's why he did not report it when he ... I don't know if he ran  
23 for reelection or what. I don't know of those details, but that Tin Moon  
24 didn't have any clients, and I think I confirmed that was my recollection,  
25 that Tin Moon didn't have any clients in 2016. They didn't start selling  
26 until April time frame of 2017.

27 Helen Eisner: During that phone call, what did Ed Graham say about that video that  
28 appeared on their website, the one involving John Ferland?

29 GMP President: Nothing that I recall. Nothing about it at all.

30 Helen Eisner: What about a photograph of Rod Blum that was on the website? What did  
31 Mr. Graham say about that?

32 GMP President: He did say something about that, and before I forget, we also talked  
33 about ... Dang it. Something else, too. Hold on. But about the photo. He

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1                   said something about that whomever it was, was complaining about the  
2                   congressional pin that he was wearing, and he said, "I don't know how  
3                   anybody could even tell what that was." He did say that. There was  
4                   something else. I almost said it, too, but I didn't want to interrupt you. I  
5                   should have and then apologized for it. I'm trying to remember what it  
6                   was. Something that was going on. I'm sorry. Maybe it'll hit me again in a  
7                   minute.
- 8   Helen Eisner:       Okay. Going back to that photograph where the Congressman was  
9                   wearing the pin, did he say what his role was in using that photograph?
- 10   GMP President:     No.
- 11   Helen Eisner:       What did he say about Congressman Blum's reaction to the coverage?
- 12   GMP President:     I don't recall, other than maybe just an overall, nothing specific, just  
13                   overall displeasure, I guess, about the things that were being said.
- 14   Helen Eisner:       You mentioned that the company didn't have clients in 2016. What about  
15                   in 2017? We've talked about the clients. What was your knowledge of the  
16                   type of revenue that the company was generating?
- 17   GMP President:     In comparison to other people, I would say it was really low, for other  
18                   people that had started around the same time frame they did, that kind of  
19                   thing. I mean, again, I could look, but to guess or to try to recall on an  
20                   annual basis, maybe \$50,000, maybe 80,000, starting in the April time  
21                   frame.
- 22   Helen Eisner:       During that phone call, did Ed Graham talk about the types of investments  
23                   that the Congressman had made in the company?
- 24   GMP President:     If he did, I don't recall any specifics. You know, let me ... Can we pause  
25                   that just a second?
- 26   Helen Eisner:       We can. I'm just going to pause the recording.
- 27   GMP President:     Yeah-
- 28   Helen Eisner:       Okay. Speaking is Helen Eisner, we are here in review 18-2049, with  
29                   [GMP President]. And, he has a phone recording from February 26, 2018,  
30                   between himself and Mr. Ed Graham that was recorded and we are going  
31                   to place the recorder next to the computer, so that we can listen to that  
32                   recording.
- 33   GMP President:     I think it's ... Hold on, I think I started it.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: Okay, and we have the recording and it will begin now.

2 GMP President: Then, we won't have to be wondering what we did or did not say.

3 **\*\*Phone Recording Begins\*\***

4 Phone Operator: The operator.

5 Automated Phone: For technical support, you are being transferred to the operator.

6 Phone Operator: Good morning, Digital Canal?

7 GMP President: Good morning, this is [GMP President], is Ed in?

8 Phone Operator: Yes, he is, one moment, sir.

9 GMP President: Thank you. Yeah, when the automated attendant did.

10 Phone Operator: Pardon me, [GMP President]?

11 GMP President: Yes.

12 Phone Operator: Alright, he's stepped away from his desk, care if I put you on hold for  
13 just a moment, please?

14 GMP President: Sure, that's fine, thank you.

15 Phone Operator: Thank you.

16 Alright, [GMP President], I'll connect you, one moment, please.

17 GMP President: Thank you.

18 Ed Graham: Good morning.

19 GMP President: Good morning, sir how are you?

20 Ed Graham: Oh, I've been better, how are you?

21 GMP President: I guess I could probably say the same.

22 Ed Graham: Yeah?

23 GMP President: Yeah, I keep getting calls from affiliates that this Bleeding Heartland  
24 bitch is talking to. She's hitting people up as late as Friday night.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Ed Graham: Really?

2 GMP President: Yeah.

3 Ed Graham: I just got a call this morning.

4 GMP President: You what?

5 Ed Graham: And, I got a call this morning from them.

6 GMP President: Oh.

7 Ed Graham: Obviously, not taking them. Wow.

8 GMP President: Well ...

9 Ed Graham: Personal destruction [GMP President], I'll tell you, it's ridiculous.

10 GMP President: I know. Well, I wanted to chat about a couple of things, and that I  
11 understand and, for the large part, support, at least from y'all's end, no  
12 comment kind of thing. Well, because whatever you say, could be  
13 twisted.

14 Ed Graham: Totally agree, yep. Not could be, it is being ...

15 GMP President: Right. But, in reading her latest article from Friday, that she thinks that  
16 this whole [GMP President] link thing is likely a scam and now she's  
17 going to turn her attention away from the fact that Rod did or did not  
18 report that he was an owner of ... And, if this was in '16, I mean, you  
19 know better than I, y'all didn't have any clients in '16.

20 Ed Graham: I know, that's what Rod said. It was nonfunctioning.

21 GMP President: Right. That's right. So, I'm wondering if it's not only going to help  
22 clarify our situation, but also try to get my neck out of the news, is if I  
23 do speak with someone. Now, I think I'd rather speak with the  
24 Associated Press as opposed to just this crazy blog lady, that's stirring  
25 the pot.

26 Ed Graham: Yeah.

27 GMP President: But, I wanted to chat with you about that first and also wanted to chat  
28 about my two titles on your website. The first one would indicate, at  
29 least, in my opinion, that I have some ... Potentially, it doesn't state it  
30 exactly, but at a quick glance you might think that I am a corporate

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 officer of your company, which of course, I'm not. And, I'm wondering  
2 about ...

3 Ed Graham: Yeah, I mean, there's Chief Technology Officer up there.

4 GMP President: Right, about ... Leading Director of SEO because that's a common  
5 thing that people have put on other websites. And, I don't know if  
6 you've seen her latest article, or not.

7 Ed Graham: No.

8 GMP President: Yeah, and I hadn't either just until this morning, but another affiliate  
9 that took quite a bit of time visiting with this lady ... And, of course,  
10 everyone has had, just as I'm sure you would if this had not come up, if  
11 somebody had called and said, "What has your experience been with  
12 [GMP President] and the folks at GMP?" Well, there's no hesitation in  
13 my mind, that you would say that it's been a good experience.

14 Ed Graham: Oh, my God, [GMP President], you know I have tremendous respect  
15 for you.

16 GMP President: Right, right and I appreciate that and just like I do for you, as well.

17 Ed Graham: Thank you.

18 GMP President: We've laughed and joked about this before, we're a couple of dinosaurs  
19 in our ...field.

20 Ed Graham: It's true.

21 GMP President: Yeah, we really know and care about each other and our clients and  
22 that kind of thing. So, I'm wondering if that is maybe misleading and  
23 also maybe if something doesn't need to be mentioned on the site  
24 about the ... Her biggest hang-up is, if everybody uses the same  
25 testimonials. When, of course, everybody is telling her, well, we don't  
26 have our own tech team, we use the [GMP President] Firm, as she  
27 keeps referring it to, and Get Me Placement to do the technical work.  
28 If maybe something that clarified that on the website would better  
29 serve these naysayers that are trying to look ill upon that your  
30 company is some kind of a scam.

31 Ed Graham: Yeah, okay. I'll certainly entertain that.

32 GMP President: That there's an affiliate relationship where you've partnered with us, to  
33 do the technical work and therefore, your tech team, and this is how



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 I've always described it, that when Monty is on the phone with  
2 someone, my tech team has been doing this for 20 years.

3 Ed Graham: Yeah.

4 GMP President: They're very likely the best in the business.

5 Ed Graham: Yeah. And, you know, when we're on sales calls when we were early  
6 and I would go at Monty because a couple of the people, [GMP  
7 President], we were talking to, you know, were our age and I would  
8 tell them, I would say, "In my humble opinion and my own words for  
9 this, I would say it's a franchise, except it's not."

10 GMP President: Right, sure, yeah.

11 Ed Graham: And, that's perfectly legal and everything and they get it when you say  
12 it that way. So, guess what, McDonalds has 100,000 clients in  
13 Dubuque. They got 100,000,000 in Iowa.

14 GMP President: Yeah.

15 Ed Graham: So, it just pisses me off to no end and you, too, I know.

16 GMP President: Yeah, I mean, I hate it for you, of course, primarily, but, of course ...

17 Ed Graham: Right.

18 GMP President: And, I don't mind a little bit of attention, but I just don't want it to have  
19 a negative impact on either one of us. But of course, you know,  
20 selfishly, I sure don't want it to have a negative impact on us and so,  
21 I'm just ...

22 Ed Graham: No way.

23 GMP President: Yeah.

24 Ed Graham: I agree.

25 GMP President: But, I'm just wondering ... And, not for an immediate answer, but think  
26 about it and let me know, about what you feel like what's in bounds  
27 and what's out of bounds, if I were to reach out, return that phone call  
28 that was left and see if I can't at least explain our situation, they hear it  
29 from me.

30 Ed Graham: Yeah.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: And, that part of it about scam and all that kind of stuff, just gets  
2 dropped. And then, let's focus on the meat of the matter, that Rod did  
3 not disclose a nonfunctioning business in 2016.

4 Ed Graham: Yeah. It's ugly and the other thing was, you know, I'm sitting here in  
5 Iowa, a high school grad career business guy, not politics, so I googled  
6 Rod. If you google Rod, right now, the first thing that'll come up is the  
7 picture I have up there. You can't tell that's a freaking Congressional  
8 pin.

9 GMP President: Yeah. I saw that, yeah, I mean, they're just really stretching.

10 Ed Graham: Oh, my Lord, [GMP President], it's insane. So, anyway, and then the  
11 piece for, whatever you call it, the Google Adword thing or whatever,  
12 I owe you an apology there because I was going to call you a few  
13 months back when I did that. Because, I saw it actually on another  
14 affiliate site and then, of course, when Kristen told me you called, I  
15 thought, "Oh, my God, I never did call him," just getting busy. And, it  
16 was probably the affiliate that was, that had Adwords about us,  
17 obviously.

18 GMP President: Right, right, there is one, he's the guy in Maryland.

19 Ed Graham: Maryland, okay.

20 GMP President: Yeah, he's gone through ... And, I took both of the tests, but the next  
21 thing that was required was for me to spend \$10,000 on Adwords,  
22 seriously. And, that was never disclosed until after I'd passed those  
23 tests and I'm not allowed to display that because I haven't spent  
24 \$10,000 with them yet. And, I'm just ... I mean, it just made me mad. I  
25 mean, that's like extortion, so ...

26 Ed Graham: I totally agree.

27 GMP President: Yeah, so I decided you're moving the goal post in the middle of the  
28 game, I'm out.

29 Ed Graham: I totally agree. Did they ask you or try to ask you about our FDA  
30 letter?

31 GMP President: No, I mean, I didn't get that because I didn't ever speak with anyone. I  
32 mean ...

33 Ed Graham: They're twisting it from a perspective of what we did was we just did  
34 a ... The guy downstairs, you know, Steve Miller?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: Yeah.

2 Ed Graham: Our website guy? He's got some clients that he's giving us obviously,  
3 for SEO, as you know. And, he was thinking about potential target  
4 being FDA letter, people that have received it. So, we sent him a letter  
5 saying, "Hey, you know you're on page one bad of Google and all that,  
6 we can get you off." So, the AP takes that and twists it to we're a scam  
7 and all of that sort of stuff. You know, I told Monty, I said, "We'll use  
8 [GMP President] if they're not Steve's clients."

9 GMP President: Right.

10 Ed Graham: Because, we've talked to Matt before about reputation management,  
11 that's why we put it in here.

12 GMP President: Sure. And, I totally agree with having that on there, but I think the way  
13 some of the wording is, that it's not maybe a clear understanding. It's  
14 basically like we're going to bury it, without saying that ... And, it did  
15 mention that there's positive information on there, but it also said ...  
16 And, these people really had to dig, I think, to find that because that's  
17 not even on your site map ...

18 Ed Graham: No.

19 GMP President: ... Anywhere, but it says, it makes a claim that only we know how to  
20 do this, and that just raises people's eyebrows. That was something  
21 else I was going to mention, that that, I think, could be word smithed  
22 to be more clear. Maybe the FDA, if you wanted to use that as an  
23 example, it could be, but it's also ... I mean, you've already got the  
24 example of the company that was really getting hurt by \$300,000 a  
25 week, but ...

26 Ed Graham: Yeah.

27 GMP President: That's on there as well. But, I think a better explanation of reputation  
28 management, do you have negative information and it mentions this,  
29 but just a few more sentences, I think, would be helpful and then  
30 maybe take off the part that only we know how to do this. Indicates  
31 like that we've discovered some secret and that we're pulling  
32 something that's potentially a scam or illegal or something that nobody  
33 else knows how to do, it just gives the wrong impression, in my  
34 opinion.

35 Ed Graham: Hm. Okay. Well, at least you know ... You've known me forever, I  
36 would not do anything I didn't think was right.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: Right, right, I agree. And, it just, it seems a little bit more aggressive, I  
2 guess.

3 Ed Graham: Yeah.

4 GMP President: And, I'm not pointing a finger, but it sounds like something that maybe  
5 Monty would say, trying to sell somebody, you know? And, you hear  
6 me laughing, I mean, when "nobody knows how to do this but us and  
7 we're the best at it", and that kind of thing. And, that sounds like it's a  
8 sales tactic, one of his tools in his tool belt, but I think certainly with  
9 all these eyes on it, it would be better if it was a little more, less  
10 aggressive, if you will.

11 Ed Graham: Okay. Yeah, that's cool and I'll keep that and the letter and ...

12 GMP President: Okay. And then, I think there's also maybe a mention of a guarantee on  
13 the reputation management, which we don't do. Because, we don't  
14 know how many sites it's going to take and all that and that's the other  
15 thing and again, it sounds like this was something, again, I'm not  
16 pointing fingers, but it sounds like something that Monty had put  
17 together because it sounds like that ... And, you guys were doing this  
18 entirely on your own, it's not a policy that we have in place, but you  
19 pay some initial fee and then you don't pay until it's on page two?

20 Ed Graham: Yes.

21 GMP President: Yeah. And, it's your business, obviously, you can do whatever you  
22 want to, but that's just not how we do it.

23 Ed Graham: Yeah, okay.

24 GMP President: Nor do we guarantee that they'll be on the second page, this negative  
25 information. So ...

26 Ed Graham: Yeah, because we were literally, Muller said that he would try one of  
27 these and what the theory was, [GMP President], just so you  
28 understand, was they wouldn't pay us other than a small setup fee,  
29 couple hundred bucks. And so, literally, they had zero risk.

30 GMP President: Right, gotcha.

31 Ed Graham: Just so you're aware, you know, if they ask her or whatever.

32 GMP President: Yeah, okay.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Ed Graham: It just makes me insane because it's all nefarious and Graham's a piece  
2 of shit and the guy's a crook and I've got children here for Christ's  
3 sakes and it's sad.

4 GMP President: Yeah, it is. Yeah, for sure. Well, I guess, give those things some  
5 thought and just let me know what your thoughts are, again, what's ...  
6 And, I don't have to call them, but I just thought if we can limit the  
7 conversation ... I mean, if it continues then I think I'm going to have to  
8 say something, but because this lady just keeps reaching out, she's  
9 reached out to four affiliates already.

10 Ed Graham: Really.

11 GMP President: Yeah, and of course, they've all said something wonderful about us.

12 Ed Graham: Yeah, that's awesome.

13 GMP President: Which, I would expect, but still, I mean, it's like she's just not going to  
14 stop until she can prove that she's, the, shit, the next Watergate  
15 investigative reporter or something.

16 Ed Graham: Yeah.

17 GMP President: She's going to uncover something here and then she's going to maybe  
18 get hired by the Associated Press or something, you know, who  
19 knows.

20 Ed Graham: Yeah, you're probably right, yeah she's ... With Rod's situation, the  
21 whole thing came because of that filing, like you said, otherwise none  
22 of this would matter. But, anyway, the filing, if what you have in the  
23 business is worth \$1,000 or less, you don't even have to do it. Well, he  
24 put in \$700 and I put in \$300.

25 GMP President: Right.

26 Ed Graham: So, it wasn't necessarily even required, but it's not, at 2016, like you  
27 said, we hadn't even had a sale, so it's not even an operating entity, no  
28 taxes or nothing.

29 GMP President: Right.

30 Ed Graham: And, that's what started it all and then they started digging. What's  
31 interesting, is some lefty must have gotten the FDA letter. Do they  
32 mention in the articles in the papers here in Iowa, including our home

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 town here, that we guarantee it, they don't have to pay us until it  
2 happens, any of that? Hell no, it just looks like we're crooks.

3 GMP President: Right, right, exactly. Well, if there's something that you would like for  
4 me to confirm, like that you guys didn't have any clients in 2016, I'd be  
5 happy to. I mean, it's the truth.

6 Ed Graham: Yeah, it's the truth. The truth always works.

7 GMP President: Yeah. You can't beat the truth, you never have to remember what you  
8 said.

9 Ed Graham: Yeah, I remember you and I laughing about that a while ago.

10 GMP President: Yeah, exactly. So, if there's something you want me to say like that, I'd  
11 be happy to and see if we can't turn the heat down just a little bit.

12 Ed Graham: Yeah, and that would help explain the how in the hell can you be in  
13 business only a year and have 11,000 clients and all of that.

14 GMP President: Exactly. Yeah, the words and with you guys disclosing on your  
15 website about your experience and just say, our tech team.

16 Ed Graham: Yeah, okay.

17 GMP President: Just those few words, our tech team has this experience or whatever  
18 and I think that would go a long way.

19 Ed Graham: Okay, I can do that, easy enough. Okay, let me think about it, maybe  
20 I'll see if I can get a conversation with Rod here or something today.

21 GMP President: Okay.

22 Ed Graham: I know he's back in D.C. but [GMP President], I appreciate your  
23 reaching out and I sincerely appreciate your backing on this because ...

24 GMP President: Yeah, absolutely, yeah, I'm not saying take me off your website, my  
25 God. No, I'm not bailing on you, I just want to help it go away as much  
26 as we can.

27 Ed Graham: Yeah, I appreciate that.

28 GMP President: So, okay.

29 Ed Graham: Appreciate it very much, thanks for calling.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 GMP President: You're welcome, alright, talk to you soon, thanks.

2 Ed Graham: Okay, bye bye.

3 GMP President: Alright, bye.

4 **\*\*Phone Recording Ends\*\***

5 Helen Eisner: We're going to go ahead and stop the recording of the phone conversation.

6 Okay. This is Helen Eisner. Back on the record with [GMP President]. On  
7 May 22nd, 2018. We just took a moment to listen to a phone recording  
8 and now I just want to ask you a few more questions.

9 Paul Solis: And also just to clarify for the record in case we didn't make it clear prior  
10 to the phone recording, that was a phone call between [GMP President]  
11 and Ed Graham on February 26th, 2017.

12 Helen Eisner: 2018.

13 Paul Solis: 2018. Sorry. So I just wanted to identify the parties of that phone  
14 recording.

15 Helen Eisner: Okay. Since then, have you had any further communication with Ed  
16 Graham?

17 GMP President: Yes. But, not about that subject. Just about Tin Moon, a troublesome client  
18 and Digital Canal getting a new website for, I think, Canal and Structural  
19 and Digital Canal Estimating, I think is the third site now. In taking some  
20 of their optimized pages and splitting them up between those three  
21 websites, we've had those type of conversations. Not about this subject  
22 matter.

23 Helen Eisner: Have you had any types of communications about the content of the  
24 website that you discussed during that phone call and changes that should  
25 be made to the website?

26 GMP President: Not since this phone call. No, Ma'am.

27 Helen Eisner: Okay. What about any conversations or communications with Monty  
28 Alexander?

29 GMP President: No. Not about the website or ... I haven't directly had any contact with  
30 Monty at all. I think y'all had a date in your RFI. I have not had any  
31 contact with him about anything.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: Have you been in contact with anyone else besides Tin Moon employees  
2 like the media or anyone else about some of the media coverage of  
3 Congressman Blum and the allegations that were in that coverage?
- 4 GMP President: I would say no. I haven't spoken to anyone. You mentioned the word  
5 employees. I have not spoken with anyone else there at Digital Canal or  
6 Tin Moon. I did not return the phone call from that lady that was saying  
7 those horrible things about us. I did not return the Associated Press phone  
8 call.
- 9 Helen Eisner: Okay. Has anyone reached out to you to discuss this Office of  
10 Congressional Ethics Investigation?
- 11 GMP President: No.
- 12 Helen Eisner: Okay. And who have you communicated with about the investigation?
- 13 GMP President: Just Justin, my son, who works here and Cassie that you met this morning.  
14 I don't think anyone else.
- 15 Helen Eisner: Okay. Do you have any other questions?
- 16 Okay. I'm going to go ahead and stop the recording.
- 17 Okay. This is Helen Eisner, again, back on the record with [GMP  
18 President]. May 22nd, 2018. Just want to clarify one additional question  
19 for you. What conversations have you had with any individuals about the  
20 Office of Congressional Ethics Review?
- 21 GMP President: The only conversations I have had have been with Ed Graham at Digital  
22 Canal/Tin Moon. I've discussed it with Cassie Feo here at GMP and Justin  
23 McCally here at GMP.
- 24 Ed and I discussed specifically about your office, Helen and Paul. We had  
25 a conversation. We were talking about a Tin Moon troublesome client. It  
26 came up in a telephone conversation that we had received correspondence  
27 from your office requesting information and that we had both received the  
28 information on the same date and that we were both going to respond and  
29 that's all that was mentioned.
- 30 Helen Eisner: Okay. Did Mr. Graham say anything else about what was included in the  
31 request for information to him?
- 32 GMP President: He did not.



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: Okay. Did he say anything else about the Office of Congressional Ethics  
2 Investigation?
- 3 GMP President: He did not. Just that he was going to respond or that he had already  
4 responded at the time we spoke. I believe that my best recollection is that  
5 he said he had already responded.
- 6 Helen Eisner: What did he say about whether or not you should respond to the request  
7 for information?
- 8 GMP President: I don't think he did say. But I told him I was going to. I don't think he  
9 offered any advice or opinion about that at all. Just that I was going to  
10 respond and that's it. We didn't discuss any details. "What are you or are  
11 you not providing?" We didn't go into any of those details at all. Just the  
12 acknowledgement that it was received on the same date by both of us.  
13 Again, I believe that he said that he had maybe already responded. That's  
14 my recollection.
- 15 Other than that, no details. The majority of the conversation, vast majority  
16 of the conversation was about this troublesome client of theirs.
- 17 Helen Eisner: Okay. Then from that point forward, have you had any communications  
18 with Ed Graham about the Office of Congressional Ethics Investigation?
- 19 GMP President: None whatsoever.
- 20 Helen Eisner: Okay. And with anyone else besides Get Me Placement employees?
- 21 GMP President: No. No one.
- 22 Helen Eisner: Okay. All right. Is there anything else that you think we should know?
- 23 GMP President: Not that we haven't already covered. No. But if you think of something,  
24 you know how to reach me.
- 25 Helen Eisner: All right. I'm going to go ahead and stop the recording now.



# **EXHIBIT 3**

ROD BLUM  
1ST DISTRICT, IOWA

COMMITTEE ON  
OVERSIGHT AND GOVERNMENT REFORM

COMMITTEE ON SMALL BUSINESS  
CHAIRMAN, SUBCOMMITTEE ON AGRICULTURE,  
ENERGY, AND TRADE

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-1501**

1108 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-2911

1050 MAIN STREET  
DUBUQUE, IA 52001  
(563) 557-7789

368 3RD STREET SE, SUITE 200  
CEDAR RAPIDS, IA 52401  
(319) 364-2288

515 MAIN STREET, SUITE D  
CEDAR FALLS, IA 50613  
(319) 268-6925

March 14, 2018

The Honorable Susan Brooks, Chair  
The Honorable Ted Deutch, Ranking Member  
House Committee on Ethics  
1015 Longworth House Office Building  
Washington, DC 20515

Dear Chairwoman Brooks and Ranking Member Deutch:

Please accept this letter as my formal submission of a self-report to the Committee to review certain allegations made against me regarding compliance with the Rules of the House. The allegations are contained in an AP news article dated February 22, 2018<sup>1</sup>. In short, the 2016 Financial Disclosure concerns were simply an oversight (which have since been corrected/amended), and the Tin Moon Corporation concerns occurred without my knowledge or consent and have since been removed (with instructions not to occur again.) I take my obligations to follow the letter and the spirit of the Rules of the House very seriously, and I am dismayed that my opponents would politicize the Committee's process over a \$700 passive investment in a company from which I earn no income and have no say over its operations.

On February 21, 2018, I previously informally reported the AP article and the concerns raised in it to Committee staff, which was as soon as I became aware of the article. My Chief of Staff John Ferland met with Senior Counsel Tamar Nedzar, and he provided her with the AP article. Ms. Nedzar, after reviewing the article with her staff colleagues, recommended submitting a self-report to the Committee<sup>2</sup>. Since that time, I immediately took the following corrective actions (as more detailed below): 1) filed immediately an amendment to my 2016 Financial Disclosure on February 21, 2018, correcting the oversights regarding Tin Moon Corporation; 2) demanded immediately Tin Moon Corporation remove my official photo (and any photo) and any reference to me from its website and any other materials; 3) demanded immediately Tin Moon Corporation remove the testimonial video featuring my Chief of Staff; 4) looked into other potential practices/operations Tin Moon Corporation may have engaged in using my name or likeness without my consent; and 5) retained legal counsel to assist with this formal self-report submission and to provide continuing House Rules compliance guidance

<sup>1</sup> The article is found at: <https://apnews.com/a4e79337ba934e87af7c7177caec5e10>

<sup>2</sup> See Attachment A.



going forward. After my first report to Committee staff on February 21, 2018, and during my preparation to file this a noted previously, I received a letter on March 7, 2018, from the Office of Congressional Ethics stating the Board opened a preliminary review of these matters.

Below is a detailed account of the concerns at issue:

ITEM 1: Failed to list Tin Moon Corporation on my 2016 Financial Disclosure.

RESPONSE: That is correct, and it purely was an oversight and unintentional. In 2016, I made a \$700 investment into Tin Moon Corporation. The company had no revenues in 2016, and it had no employees in 2016. Although below the reporting threshold, I subsequently amended my 2016 Financial Disclosure to disclose the investment.

ITEM 2: Failed to list I was a Director of Tin Moon Corporation on my 2016 Financial Disclosure.

RESPONSE: That is correct, and it purely was an oversight and unintentional. Since I inadvertently omitted the \$700 investment, I forgot to list the Director position. I have never been paid to be a Director of Tin Moon. I am not an employee of Tin Moon Corporation, nor have I ever been paid for any position in Tin Moon Corporation. I subsequently amended my 2016 Financial Disclosure to disclose the unpaid Director position. Also, I am not an officer of the company.

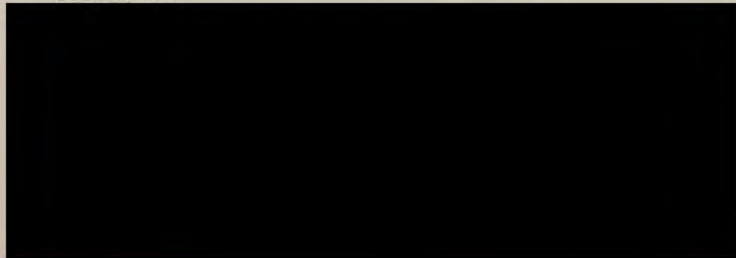
ITEM 3: My official government House photo was used on the Tin Moon Corporation website.

RESPONSE: I have nothing to do with the operations of this company. I am basically a silent/passive investor. I did not consent or give permission to use my official photo (or any photo), and, in fact, I had no idea my official photo was placed on the website. I would not have given permission to use any photo of me. Had I known it was on the website, I would have requested immediately that it be taken down. I have since learned that the other owner and manager of Tin Moon Corporation, Ed Graham, on his own (and without my knowledge or my permission) searched the Internet and found a photo of me to use for the website. It happened to be my official House photo. The manager had no idea it was a problem, and I was not made aware of it. My Chief of Staff upon being made aware of the photo, notified the manager immediately to remove the photo from the website. Additionally, nowhere in my Bio (that used the picture) was it mentioned that I was a Congressman.

ITEM 4: John Ferland, my District Director at the time and now my Chief of Staff, recorded a video that was placed on the Tin Moon Corporation website<sup>3</sup>.

RESPONSE: Once again, I have never worked at Tin Moon Corporation, and I am not involved in the daily operations of the company. Ed Graham has subsequently told me after inquiry that he asked John (then my District Director) offhandedly to record a video in Ed's office talking about the company simply because John and Ed are friends independently of John's House employee status. It had nothing to do with John's (or my) official position with the House. John's House position was not referenced or that he worked on my staff. John did not receive any compensation for the video. I personally had no idea this was done, nor had I actually ever seen the video. John did not give permission and did not know the video was uploaded to the Tin Moon Corporation website, nor that it was ever used for any purpose. The AP article says that the video was uploaded from my account. I have no idea to what account they are referring. All I can say is I was not aware that any account of mine existed let alone that it was used to upload a video to the Tin Moon Corporation website.

The Committee's consideration and guidance regarding these matters is very much appreciated, and I look forward to working toward bringing this matter to a quick resolution.



Rod Blum  
IA-01

---

<sup>3</sup> Bleeding Heartland a critical blog separately copied and uploaded the video on February 21, 2018:  
[https://youtu.be/jx7kW\\_PWEgM](https://youtu.be/jx7kW_PWEgM)

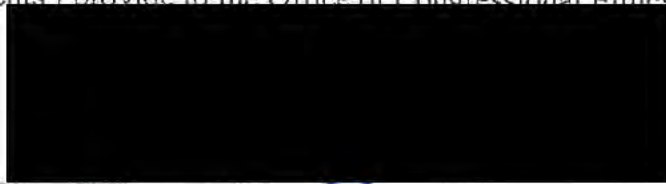


OFFICE OF CONGRESSIONAL ETHICS  
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the False Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Signature:



Name:

*Rod Blum*

Date:

*4/24/18*

---

FOR OFFICIAL USE

Review(s) No.:

# **EXHIBIT 4**



**Subject:** Fwd: Introductions

**Date:** Friday, March 9, 2018 at 4:13:39 PM Eastern Standard Time

**From:** Ferland, John

**To:** Tim Kronquist

John Ferland  
Chief of Staff  
Congressman Rod Blum IA-01  
1108 Longworth House Office Building  
[REDACTED] [@mail.house.gov](mailto:[REDACTED]@mail.house.gov)

Office (202) 225-[REDACTED]

Cell [REDACTED]

[Website](#) | [Twitter](#) | [Facebook](#) | [eNewsletter Signup](#)

Begin forwarded message:

**From:** "Nedzar, Tamar" <[REDACTED]>  
**Date:** February 22, 2018 at 11:43:41 AM EST  
**To:** "Ferland, John" <[REDACTED]>  
**Subject:** RE: Introductions

At this time, based on our conversation yesterday (no compensation for testimonial), I do not think there is any action you need to take at this time.

Ms. Tamar Nedzar  
Senior Counsel  
Committee on Ethics  
U.S. House of Representatives  
1015 Longworth House Office Building  
Washington, DC 20515  
Phone: (202) 225-7103  
Fax: (202) 225-7392

---

**From:** Ferland, John  
**Sent:** Thursday, February 22, 2018 11:05 AM  
**To:** Nedzar, Tamar <[REDACTED]>  
**Subject:** Re: Introductions

Thank you, Tamar. I will share this information with Congressman Blum.

With regard to me, should I personally be taking any action?

I can stop back by if needed,

John Ferland  
Chief of Staff  
Congressman Rod Blum IA-01

1108 Longworth House Office Building

[REDACTED]@mail.house.gov

Office (202) 225-[REDACTED]

Cell [REDACTED]

[Website](#) | [Twitter](#) | [Facebook](#) | [eNewsletter Signup](#)

On Feb 22, 2018, at 10:52 AM, Nedzar, Tamar <[REDACTED]> wrote:

John,

Thank you for stopping by yesterday.

I spoke to our staff internally about the article and allegations therein. It might be a good idea for Mr. Blum to do what is called a self-report, at his discretion. A self-report is essentially a letter to the Committee acknowledging a potential issue, and asking the Committee to further review it. A self-report will not stop an OCE process, and it may lead to a scope that extends beyond what is contained in the self-report.

Please let me know if you or Mr. Blum have any additional questions.

Thank you,

Ms. Tamar Nedzar  
Senior Counsel  
Committee on Ethics  
U.S. House of Representatives  
1015 Longworth House Office Building  
Washington, DC 20515  
Phone: (202) 225-7103  
Fax: (202) 225-7392

---

**From:** Ferland, John  
**Sent:** Wednesday, February 21, 2018 4:58 PM  
**To:** Nedzar, Tamar <[REDACTED]>  
**Subject:** RE: Introductions

Thank you for your time,

Here is the article. <https://www.usnews.com/news/best-states/iowa/articles/2018-02-21/iowa-congressman-failed-to-disclose-internet-company>

---

**From:** Nedzar, Tamar  
**Sent:** Thursday, February 8, 2018 10:41 AM  
**To:** Ferland, John <[REDACTED]>  
**Cc:** Herrin, Christina <[REDACTED]>  
**Subject:** RE: Introductions

Happy to help. Please feel free to call, email, or stop by B249 in Longworth to chat.

Ms. Tamar Nedzar  
Senior Counsel  
Committee on Ethics  
U.S. House of Representatives  
1015 Longworth House Office Building  
Washington, DC 20515  
Phone: (202) 225-7103  
Fax: (202) 225-7392

---

**From:** Ferland, John  
**Sent:** Thursday, February 8, 2018 10:40 AM  
**To:** Nedzar, Tamar <[REDACTED]>  
**Cc:** Herrin, Christina <[REDACTED]>  
**Subject:** Introductions

Hello Tamar,

I appreciate you sitting down with me earlier this week, especially on such short notice.

I want to introduce you to Ms. Herrin with our DC office. She may accept a position/promotion to work in our Cedar Rapids office and if she has any questions that I am unable to answer, I thought it would be good to connect you with her.

John Ferland  
Chief of Staff  
Congressman Rod Blum IA-01  
1108 Longworth House Office Building  
[REDACTED]@mail.house.gov  
Office (202) 225-[REDACTED]  
Cell [REDACTED]  
[Website](#) | [Twitter](#) | [Facebook](#) | [eNewsletter Signup](#)

# **EXHIBIT 5**

# Tin Moon Labs Reputation Management Service

## Your Business Received a Warning Letter From The FDA

If you are reading this page, you received a letter from us regarding moving your FDA warning letter off page one of search results.

When someone performs an online search of your business name, the FDA warning letter is prominently seen on page one of search results.

This damaging content will have current customers reconsidering their relationship with your business. A potential new customer, will not even contact you!

**[Click Here To Contact Us](#)**



## WE CAN HELP

We WILL remove the derogatory FDA Letter from page one so it no longer damages your business and reputation!

## Only We Know How To Do This

We are a highly skilled and experienced search engine optimization company successfully working with 11,000 satisfied clients. Throughout this experience we created a NEW and UNIQUE Technology Process that only we possess. The system removes negative information from page one search results. This proprietary Technology Process and Strategy will move the FDA letter to page two or further back of search results or we are not paid! Our unique process also maintains the placement at page two or further back where the FDA Letter will no longer damage your business.

## Your Investment is Guaranteed

Your investment is Risk-Free with the exception of a small set up fee! You win or we don't get paid, now that is real incentive for us to help your business. When the FDA letter is moved to page two, we send an invoice. We do not require automatic ACH payments. You are not invoiced until the FDA letter is moved to page two. If it appears back on page one, you are not invoiced and we work again to move it off page one.

## CONTACT US TO LEARN MORE

Call Monty Alexander, our Reputation Management Professional Toll Free at: 844.471.7033 Ext. [REDACTED]

Or [Click Here to Contact Us](#)

Copyright, TinMoonLabs.com, All Rights Reserved

Website by The Stevens Company

# **EXHIBIT 6**



254156

# ARTICLES OF INCORPORATION OF DIGITAL CANAL CORPORATION

The undersigned, acting as incorporator of a corporation organized under the Iowa Business Corporation Act, as may be amended from time to time (the "Act"), hereby adopts the following Articles of Incorporation for such corporation.

**I. NAME.** The name of the corporation is **DIGITAL CANAL CORPORATION.**

**II. POWERS.** The corporation shall have unlimited powers to engage in and do any lawful act concerning any and all lawful businesses for which corporations may be organized under the Act.

**III. STOCK.**

A. The corporation shall have one class of stock. The maximum number of shares of stock which the corporation shall have authority to issue is twenty million (20,000,000), all of which shall be common stock. Ten million (10,000,000) of the authorized shares shall be voting common shares without par value and ten million (10,000,000) of the authorized shares shall be non-voting common shares without par value.

B. Any unissued shares of any class, herein authorized or hereafter increased or created, may be issued from time to time by the corporation in such manner, amounts and proportions and for the consideration determined from time to time by the Board of Directors, in accordance with these articles and any applicable law.

C. At all times each holder of voting common stock of the corporation shall be entitled to one vote upon each matter submitted to a vote at a meeting of the shareholders for each share of stock standing in the name of the shareholder on the books of the corporation. Each holder of nonvoting common stock of the corporation shall not have the right to vote, at any time, on any matter affecting the corporation, except as required by the Act.

D. The holders of the shares of the common stock of the corporation shall not have preemptive rights.

E. Restrictions on the transfer of any shares issued by the corporation may be imposed either by agreement or in the bylaws.

**IV. REGISTERED OFFICE AND REGISTERED AGENT.** The address of the initial registered office of the corporation is 1143 Hunters Ridge, Dubuque, IA 52003, and the initial registered agent at such address is Rod Blum.

1311

54335 ART110 \$50.00 DUG 2

3

**V. DIRECTORS.**

A. The number of directors constituting the initial board of directors is one (1), and the name and address of the person who is to serve as the initial director until the first annual meeting of shareholders or until his successor is elected and shall qualify are:

Name:  
Rod Blum

Address:  
[Redacted]  
Dubuque, IA 52003

B. After the initial board of directors, the number of directors the corporation shall be at least one (1) but not more than seven (7). The directors may fix and determine from time to time the number of directors within the authorized range.

C. The terms of directors may be staggered on a basis set forth in the bylaws and in accordance with law.

**VI. INCORPORATOR. The name and address of the incorporator is as follows:**

Name:  
Rod Blum

Address:  
[Redacted]  
Dubuque, IA 52003

**VII. EFFECTIVE DATE OF INCORPORATION. The effective date of the corporation shall be the date of filing these Articles of Incorporation with the Iowa Secretary of State.**

**VIII. PERSONAL LIABILITY.**

A. A director of this corporation shall not be personally liable to the corporation or its stockholders for monetary damages for breach of fiduciary duty as a director, except for liability (i) for any breach of the director's duty of loyalty to the corporation or its stockholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or knowing violation of the law, (iii) for any transaction from which the director derived an improper personal benefit, or (iv) any unlawful distribution under the Act voted for or assented to by a director.

B. If the Act is amended after the effective date of these Articles to authorize the further elimination or limitation of the liability of directors, then the liability of directors shall be eliminated to the full extent authorized by the Act, as so amended.

C. No amendment to or repeal of this Article shall apply to or have any effect on the liability or alleged liability of any director of the corporation for or with respect to any acts or omissions of such director occurring prior to such amendment or repeal.

**IX. INDEMNIFICATION OF DIRECTORS.** This corporation shall indemnify a director of this corporation, and each director of this corporation who is serving or who has served, at the request of this corporation, as a director, officer, partner, trustee, employee or agent of another corporation, partnership, joint venture, trust, other enterprise or employee benefit plan to the fullest extent possible against expenses, including attorneys' fees, judgments, fines, settlements and reasonable expenses, actually incurred by such director relating to his or her conduct as a director of this corporation or to his or her conduct while serving at the request of this corporation as a director, officer, partner, trustee, employee or agent of another corporation, partnership, joint venture, trust, other enterprise or employee benefit plan, except that the mandatory indemnification required by this sentence shall not apply (i) to a breach of a director's duty of loyalty to the corporation or its stockholders, (ii) for acts or omissions not in good faith or which involve intentional misconduct or knowing violation of the law, (iii) for a transaction from which a director derived an improper personal benefit, or (iv) to any director who votes for or assents to an unlawful distribution under the Act.

DATED at DUBUQUE, Iowa this 13 day of JUNE, 2001.

  
Rod Blum, Incorporator

FILED  
IOWA  
SECRETARY OF STATE

6-15-2001  
11:57 AM  
W278996



# **EXHIBIT 7**



**Monty Alexander**

September 23, 2017 · Dubuque, IA · 🌐



Please share on your wall for me? Pretty please? Thank you in advance!!  
The company I've worked at almost 17 years has put me in charge of Tin Moon Corporation. Can all of you please share this to your walls to get the message out? Thank you in advance!

Curious why your website does not produce leads? Is your website testing 92% or higher? Test it now FREE tinmoonlabs.com click on Free Site test and put your website and competitors site;) if you want to learn more, contact me through our website at tinmoonlabs.com we will do local and we can generate leads nationwide. My latest client increased 42% in his first 60 days. #Advertising #marketing #Website #business #fortune500 #nationwide #entrepreneur #tradesecrets #profits #seo #ppc #win #websitetraffic



TINMOONLABS.COM

**Tin Moon Corporation Iowa**

Tin Moon Labs Iowa. Tin Moon Corporation offers professional online SEO...

Like

Comment

Share

# **EXHIBIT 8**

[Home](#)[Solutions](#)[Services](#)[Company](#)[Contact](#)

---

**[CLICK HERE](#) for Current Promotion**

[Home](#) » [Company](#) » **Careers**

---

## Careers

Digital Canal is always looking for extraordinary people who strive for success. We recognize that our company's success is in large part due to the diligence, talent and dedication of our employees.

Digital Canal caters to the needs of its employees with a comprehensive benefits program, including:

- Comprehensive Major Medical health plan
- 401K retirement plan with company match
- Short term disability insurance
- Long term disability insurance
- Life insurance
- Vacation time with pay
- Holiday time with pay
- Casual working environment
- Free off street parking

Digital Canal is growing and currently has a need for the following positions:

- **Software developers:** The ideal candidate would be proficient in programming, preferably C/C++/C# in the Microsoft Developer Studio platform.
- **Software engineers:** Enhance and update existing products and create new products for our industries.
- **Product Specialists:** Work directly with software engineers to provide product design guidance for new features / products, work directly with clients in assisting them with questions, providing training, performing product demonstrations, product testing, etc.
- **Sales:** Our products provide clients with a fast return on their investment and our environment, pay package, etc. is very conducive to sales.

To apply for any of these positions please email your resume to [kwubben@](mailto:kwubben@) 

Or mail your resume to:

18-2049\_0071

Digital Canal Corporation

Kristen Wubben – Position you are applying for

2728 Asbury Road

Dubuque, IA 52001

---

[Home  
Company](#)

[Solutions  
Contact](#)

[Services](#)

© 2018 Digital Canal. All Rights Reserved. | [Sitemap](#)



# **EXHIBIT 9**

April 26, 2018

Omar S. Ashmawy  
Staff Director and Chief Counsel  
Office of Congressional Ethics  
P.O. Box 895  
Washington, DC 20515-0895

Re: REVIEW NO. 18-2049

Dear Mr. Ashmawy,

I write to explain some of the circumstances surrounding the incidents that sparked the Office of Congressional Ethics' review of Representative Rod Blum. I am the co-owner and manager of Tin Moon Corporation, as well as the president of Digital Canal. I am dismayed by the nature of the accusations being pointed at Representative Blum. It is my hope that this letter will assist the Office of Congressional Ethics in concluding its review in an amicable and expedient manner.

Tin Moon was incorporated in 2016 and was funded by Representative Blum and Ed Graham as investors. Representative Blum, who made a singular seven hundred dollar (\$700.00) investment on June 20, 2016 and I made a singular three hundred dollar (\$300.00) investment on June 20, 2016. During all of 2016, Tin Moon had no employees, no revenues and no profits. The company existed basically only on paper. While Representative Blum is technically a Director of Tin Moon, he has never been paid by Tin Moon for being a Director, or for any work and has never been an employee or Manager. To be clear - Representative Blum has never been involved with any of the operations of Tin Moon.

Unfortunately, Representative Blum's official House of Representatives photo indeed was placed on the Tin Moon website; however, Representative Blum was not involved with its placement in any way. As owner and manager, I run the daily operations of Tin Moon. As part of these daily operations, I decided to place Representative Blum's image on the Tin Moon website without knowing that such utilization of the Congressman's image was problematic. In fact, I was not aware that the image was Representative Blum's "official" Congressional photo. Additionally, nowhere in Representative Blum's biography on the website was it mentioned that he was a Congressman.

I similarly decided to place a video featuring a friend of mine, John Ferland who also happened to be Representative Blum's District Manager in Iowa. John acted as an unpaid spokesperson, in which he stated he was representing Digital Canal Corporation on the Tin Moon website. Representative Blum did not direct, authorize, permit, or in any way empower me to use these images on this website. Nor did he know that I decided to do so. As stated above, Representative Blum is not involved with the day-to-day operation of Tin Moon, and website content certainly falls into this category. In fact, to my knowledge, Representative Blum did not know that I had placed these images on the websites until the Associated Press article was published. Upon his

discovery of these images, Representative Blum asked me, through his Chief of Staff, to remove them immediately, which I did.

Moreover, I have never used Representative Blum's position as a member of congress to market Tin Moon or Digital Canal – this makes no sense from a business stand point because I would immediately risk alienating 50 percent of the marketplace. I have never represented that any benefit would be passed onto any client because of Representative Blum's position. Even more, Representative Blum's biography on the website did not even mention the fact that he was a member of congress—nor was this fact mentioned anywhere else on the website. Because Representative Blum was not involved in the day-to-day operation of Tin Moon or Digital Canal, I am not aware of any instance in which he ever used his position to market or otherwise benefit either business in any way.

In sum, Representative Blum is not involved in the daily operations of Tin Moon or Digital Canal, does not generate any income from Tin Moon or Digital Canal as a Director or employee, did not authorize Tin Moon to use his image on its website, and did not use or permit anyone to use his position as a member of congress to the benefit of either business.

I appreciate your office's consideration of these facts and hope it takes them into consideration before making its decision.



Ed Graham

OFFICE OF CONGRESSIONAL ETHICS  
U.S. HOUSE OF REPRESENTATIVES

18 U.S.C. § 1001 ACKNOWLEDGEMENT

I have been provided with a copy of the text of section 1001 of title 18, United States Code (popularly known as the False Statements Act) and hereby acknowledge that it applies to any testimony or documents I provide to the Office of Congressional Ethics.

Signature:



Name:

EO Graham

Date:

4-26-18

FOR OFFICIAL USE

Review(s) No.:

\_\_\_\_\_

# **EXHIBIT 10**

# Tin Moon SEO Services

What We Do Free Site Test Pricing About Us Contact Us

## About Us

We own another business that employed the professional Search Engine Optimization (SEO) tools that we will also implement for you. So what you ask? Well, this professional SEO strategy continues to save us hundreds of thousands of dollars by eliminating our Pay per Click (PPC) advertising fees. By employing the same SEO strategy that we implemented for our own company, for your company, we can generate the same results, saving money and increasing your website traffic.

### BY SALES AND MARKETERS FOR SALES AND MARKETERS:



Rod Blum is the company's CEO. Rod possesses a Masters Degree in Marketing and was the Valedictorian of his class at the University of Dubuque.

Rod's marketing expertise and leadership skills guided a small company to exponential growth resulting in the company's public listing on the NASDAQ Exchange. Rod's marketing expertise was paramount in this accomplishment. At various times during his tenure he and the company he led received many awards. Some of the most notable include:

- Earnest & Young "Entrepreneur of the Year"
- Magazine - "Inc. 500" (not Inc. 5,000) - 3 times before going public
- Fast Company Magazine "100 Fastest Growing Tech firms"
- Softletter Ezine - "Softletter 100" - multiple times
- Company listing on the NASDAQ



After college Rod joined a small software company with good products but very little sales and marketing knowledge or expertise. Rod's skills were proven quickly and he was made an owner of the company whereby he used his marketing, sales and leadership skills to grow the company.

This growth resulted in a doubling of revenues each year for several years. As a result, the incredible revenue growth culminated with the company "going public" on the NASDAQ Exchange just 5 years after Rod joined the company.



Ed Graham is the company's President and oversees day to day operations.

After serving in the US Navy Ed joined the same small privately held Software Company that Rod spear headed. Ed's sales and marketing knowledge helped this software company's sales team optimize revenues with SEO tools as the internet began to become the frontier in sales and marketing.

Ed served as a Vice President of multiple divisions of the NASDAQ listed company. This included the Emerging Markets divisions where the dawn of the internet would eventually shape sales and marketing activities to the level it has today.

Ed's team explains the new sales lead generation frontier (SEO) simply by stating that "If your silent business partner is not willing to provide you with a money back guarantee for results then they are not a business partner at all." We remain humble and we do what we say we will do or you do not have to pay us, pretty simple formula.

### TECHNICAL EXPERTISE AND RESEARCH:



Todd McCally is the Chief Technology Officer and Director of SEO Activity and Research. In the past Todd has owned and managed two internet-based businesses himself. Seeing the future and knowing that SEO was the best marketing and sales investment a company could make, Todd immersed himself in SEO in 1998. To date, this team has achieved 100% success in optimizing over 40,000 websites nationwide. Todd is the Guru of all SEO Guru's and his (and the team's) time tested and proven expertise, unique SEO knowledge and long record of successful implementations are the reason we will provide you a 100% money back guarantee. Todd can literally see around corners and knows what it takes to put you on page 1 and keep you there. This is very rare expertise to be sure.

Edit

Why SEO  
Why Tin Moon  
FAQ  
Success Stories

Free Site Test  
Free Pricing  
About Us  
Contact



Startup

# **EXHIBIT 11**

## About Us

### BY SALES AND MARKETERS FOR SALES AND MARKETERS:



**Rod Blum** is the company's CEO. Rod possesses a Masters Degree in Marketing and was the Valedictorian of his class at the University of Dubuque.

Rod's marketing expertise and leadership skills guided a small company to exponential growth resulting in the company's public listing on the NASDAQ Exchange. Rod's marketing expertise was paramount in this accomplishment. At various times during his tenure he and the company he led received many awards. Some of the most notable include:

- Earnest & Young "**Entrepreneur of the Year**"
- Magazine - "**Inc. 500**" (not Inc. 5,000) - **3 times** before going public
- Fast Company Magazine "**100 Fastest Growing Tech firms**"
- Softletter Ezine - "**Softletter 100**" - multiple times
- Company listing on the **NASDAQ**

After college Rod joined a small software company with good products but very little sales and marketing knowledge or expertise. Rod's skills were proven quickly and he was made an owner of the company whereby he used his marketing, sales and leadership skills to grow the company.

This growth resulted in a doubling of revenues each year for several years. As a result, the incredible revenue growth culminated with the company "going public" on the NASDAQ Exchange just 5 years after Rod joined the company.

**Ed Graham** is the company's President and oversees day to day operations.





Internet began to become the frontier in sales and marketing.

Ed served as a Vice President of multiple divisions of the NASDAQ listed company. This included the Emerging Markets divisions where the dawning of the Internet would eventually shape sales and marketing activities to the level it has today.

## TECHNICAL EXPERTISE AND RESEARCH:



**Todd McCally** is the Chief Technology Officer and Director of SEO Activity and Research. In the past Todd has owned and managed two Internet-based businesses himself. Seeing the future and knowing that SEO was the best marketing and sales investment a company could make, Todd immersed himself in SEO in 1998. To date, this team has achieved 100% success in optimizing over 40,000 websites nationwide.

Todd is the Guru of all SEO Guru's and his (and the teams) time tested and proven expertise, unique SEO knowledge and long record of successful implementations are the reason we will provide you a 100% money back guarantee. Todd can literally see around corners and knows what it takes to put you on page 1 and keep you there. This is very rare expertise to be sure.





**FAST COMPANY**



844 471 7033

info@TinMoonLabs.com

Drop us line anytime

Get a Quote  
Get all the information

## About Us

Tin Moon Corporation was founded with the idea that we can help businesses grow by using our own proven marketing experience and expertise to increase your business. We became our own Case Study by implementing the time tested and unique SEO Strategies that we will use to help you, in another business with the same ownership as Tin Moon Corporation.

**Test Your Site**

**Success Stories**

**Sitemap**

Contact info

equation every company is hoping to experience. Given this success we decided to bring our expertise to you so we can increase your traffic and save you money. In today's digital world you have many choices. But, very few provide guaranteed results by having used these unique Strategies **themselves**.

Tin Moon Corporation  
2728 Asbury Road  
Dubuque, IA 52001

Copyright, TinMoonLabs.com, All Rights Reserved

Website by The Stevens Company

# **EXHIBIT 12**

## About Us

### BY SALES AND MARKETERS FOR SALES AND MARKETERS:



**Rod Blum** is the company's majority shareholder. Rod possesses a Masters Degree in Marketing and was the Valedictorian of his class at the University of Dubuque.

Rod's marketing expertise and leadership skills guided a small company to exponential growth resulting in the company's public listing on the NASDAQ Exchange. Rod's marketing expertise was paramount in this accomplishment. At various times during his tenure he and the company he led received many awards. Some of the most notable include:

- Earnest & Young "**Entrepreneur of the Year**"
- Magazine - "**Inc. 500**" (not Inc. 5,000) - **3 times** before going public
- Fast Company Magazine "**100 Fastest Growing Tech firms**"
- Softletter Ezine - "**Softletter 100**" - multiple times
- Company listing on the **NASDAQ**

After college Rod joined a small software company with good products but very little sales and marketing knowledge or expertise. Rod's skills were proven quickly and he was made an owner of the company whereby he used his marketing, sales and leadership skills to grow the company.

This growth resulted in a doubling of revenues each year for several years. As a result, the incredible revenue growth culminated with the company "going public" on the NASDAQ Exchange just 5 years after Rod joined the company.

**Ed Graham** is the company's President and oversees day to day operations.





After serving in the US Navy Ed joined the same small privately held Software Company that Rod spear headed. Ed's sales and marketing knowledge helped this software company's sales team optimize revenues with SEO tools as the Internet began to become the frontier in sales and marketing.

Ed served as a Vice President of multiple divisions of the NASDAQ listed company. This included the Emerging Markets divisions where the dawning of the Internet would eventually shape sales and marketing activities to the level it has today.

## TECHNICAL EXPERTISE AND RESEARCH:



**Todd McCally** is the Chief Technology Officer and Director of SEO Activity and Research. In the past Todd has owned and managed two Internet-based businesses himself. Seeing the future and knowing that SEO was the best marketing and sales investment a company could make, Todd immersed himself in SEO in 1998. To date, this team has achieved 100% success in optimizing over 40,000 websites nationwide.



Todd is the Guru of all SEO Guru's and his (and the teams) time tested and proven expertise, unique SEO knowledge and long record of successful implementations are the reason we will provide you a 100% money back guarantee. Todd can literally see around

corners and knows what it takes to put you on page 1 and keep you there. This is very rare expertise to be sure.





844 471 7033

[info@TinMoonLabs.com](mailto:info@TinMoonLabs.com)

Drop us line anytime

Get a Quote  
Get all the information

## About Us

Tin Moon Corporation was founded with the idea that we can help businesses grow by using our own proven marketing experience and expertise to increase your business. We became our own Case Study by implementing the time tested and unique SEO Strategies that we will use to help you, in another business with the same ownership as Tin Moon Corporation.

[Test Your Site](#)

[Success Stories](#)

[Sitemap](#)

[Contact info](#)

The result was that we reduced our cost while simultaneously increasing our traffic. This is exactly the business equation every company is hoping to experience. Given this success we decided to bring our expertise to you so we can increase your traffic and save you money. In today's digital world you have many choices. But, very few provide guaranteed results by having used these unique Strategies **themselves**.

844 471 7033

info@TinMoonLabs.com

Tin Moon Corporation  
2728 Asbury Road  
Dubuque, IA 52001

Copyright, TinMoonLabs.com, All Rights Reserved

Website by The Stevens Company



# **EXHIBIT 13**

## Eisner, Helen

---

**From:** Todd McCally <[REDACTED]>  
**Sent:** Monday, May 07, 2018 10:26 AM  
**To:** Eisner, Helen  
**Subject:** RFI Review No. 18-2049  
**Attachments:** RE: Discussion next week ...

Dear Helen,

As we discussed by phone, I am in receipt of your office's RFI dated April 13, 2018 regarding our business dealings with Tin Moon Corporation. Allow me to provide a brief overview of what we call our "Affiliate Program". We are a search engine optimization (SEO) company but we also teach SEO to those that are wanting to learn the business. Our program, through a Software Licensing Agreement, provides client management software we developed, training, and mentorship for our affiliates to be 100% independent on their own. It's similar to a franchise opportunity but I (nor GetMePlacement, LLC) have any ownership or financial interests in the affiliate's business. If any affiliate sells a client, I am not notified nor participate financially in the profits (or loss) with any client they may provide service to.

The following are my responses to your office's questions:

1. GetMePlacement, LLC (GMP) entered into multi-part agreement with Tin Moon Corporation (TMC) and a third party to provide a Software Licensing Agreement (SLA) (for TMC) and optimization services for the third party. All of which was paid for by the third party that is not identified in your RFI; therefore, I believe it is confidential information that I do not feel comfortable disclosing. Regarding the relationship between me, GMP and any business I am affiliated with, I (nor GMP) have no corporate title, board membership nor ownership interest in TMC nor the third party mentioned above.
2. I did not create nor participate in any business plan for TMC, should one exist. As an "affiliate" and using GMP to perform the technical SEO work, we allow our affiliates to use GMP's tech department's reputation when again, GMP is performing the technical work. It should be clear when any affiliate references a client example, testimonial etc., that it is their tech team (or the GMP tech team) that boasts these abilities. It is GMP's tech team that has performed optimization work for over 11,000 clients.
3. I have a copy of TMC's site when it was created on 7/29/2016 but according to your correspondence, I am not to provide pdf's, etc. During your visit, I can show you what was created originally as part of the SLA, but the site has changed significantly since then. The changes were not performed by me or GMP. I nor GMP hosts the TMC website.
4. The SLA includes GMP providing up to 5,000 sales leads to call upon. Beyond that, I am not aware of any specific client solicitations or marketing efforts on behalf of Tin Moon Labs, prior to launching them. I later learned of a reputation management marketing effort via various articles I saw online. This was discussed with Mr. Graham on a telephone call dated 2/26/18. Regarding client lists, there is a clause in our agreement that prohibits GMP from interfering with TMC and its clients. Should a client list exist, you will need to get that from TMC. I do know their first client was sold the 2<sup>nd</sup> quarter of 2017. I know this because they hired GMP to perform the technical work on the client's website.
5. I have never seen, nor do I have access to profit and loss statements for TMC, should they exist.

6. I have never spoken to, met or corresponded with Representative Rod Blum nor John Ferland. I have not corresponded with Monty Alexander on or after February 1, 2018. The only correspondence I've had with Ed Graham since 2/1/2018 is regarding the website for another company, with the exception of the email correspondence attached. There is also the phone call mentioned above. Since the company we have corresponded about is not listed in the RFI, I do not feel it is appropriate to provide non-related/privileged correspondence.

I truly hope this helps give a better understanding of my relationship with Tin Moon. I have marked my calendar for 5/22/2018 from 10am to 11am for your visit.

Todd McCally



[Todd@\[REDACTED\]](mailto:Todd@[REDACTED])

# **EXHIBIT 14**

## About Us

### **BY SALES AND MARKETERS FOR SALES AND MARKETERS:**



**Ed Graham** is the company's President and oversees day to day operations.

After serving in the US Navy Ed joined a small privately held Software Company. Ed's sales and marketing knowledge helped this software company's sales team optimize revenues with SEO tools as the Internet began to become the frontier in sales and marketing.

Ed served as a Vice President of multiple divisions of the NASDAQ listed company. This included the Emerging Markets divisions where the dawning of the Internet would eventually shape sales and marketing activities to the level it has today.



**Todd McCally** is the Chief Technology Officer and Director of SEO Activity and Research. In the past Todd has owned and managed two Internet-based businesses himself. Seeing the future and knowing that SEO was the best marketing and sales investment a company could make, Todd immersed himself in SEO in 1998. To date, this team has achieved 100% success in optimizing over 40,000 websites nationwide.

Todd is the Guru of all SEO Guru's and his (and the teams) time tested and proven expertise, unique SEO knowledge and long record of successful implementations are the reason we will provide you a 100% money back guarantee. Todd can literally see around corners and knows what it takes to put you on page 1 and keep you there. This is very

rare expertise to be sure.





844 471 7033

[info@TinMoonLabs.com](mailto:info@TinMoonLabs.com)

Drop us line anytime

Get a Quote  
Get all the information

## About Us

Tin Moon Corporation was founded with the idea that we can help businesses grow by using our own proven marketing experience and expertise to increase your business. We became our own Case Study by implementing the time tested and unique SEO Strategies that we will use to help you, in another business with the same ownership as Tin Moon Corporation.

[Test Your Site](#)

[Success Stories](#)

[Sitemap](#)

The result was that we reduced our cost while simultaneously increasing our traffic. This is exactly the business equation every company is hoping to experience. Given this success we decided to bring our expertise to you so we can increase your traffic and save you money. In today's digital world you have many choices. But, very few provide guaranteed results by having used these unique Strategies **themselves**.

## Contact info

844 471 7033

info@TinMoonLabs.com

Tin Moon Corporation  
2728 Asbury Road  
Dubuque, IA 52001

Copyright, TinMoonLabs.com, All Rights Reserved

Website by The Stevens Company



# **EXHIBIT 15**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

**Transcript of Interview of District Staffer  
OCE Review No. 18-2049  
May 15, 2018**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: This is Helen Eisner speaking from the Office of Congressional Ethics. I am  
2 joined by my colleague, Investigative Counsel Jeffrey Brown. This is Review 18-  
3 2049. We are here with [District Staffer]. Am I pronouncing that correctly?

4 District Staffer: Yes.

5 Helen Eisner: On May 15, 2018. We have given [District Staffer] a copy of the False  
6 Statements Act. He has signed the acknowledgment form and we will go ahead  
7 and get started.

8 Where do you currently work?

9 District Staffer: I work for Congressman Blum in his Dubuque office.

10 Helen Eisner: Okay. And what is your position in that office?

11 District Staffer: District Director.

12 Helen Eisner: And how long have you been District Director?

13 District Staffer: Since April 1.

14 Helen Eisner: And that's April 1 of this year?

15 District Staffer: 2018, yeah.

16 Helen Eisner: Okay. And prior to that where were you working?

17 District Staffer: I was in the jungle of South America for ten months. I worked for the Cathedral  
18 of the Immaculate Conception, associated with the Diocese of Georgetown. And  
19 I was essentially a humanitarian volunteer, or an unpaid worker I guess, for the  
20 Diocese of Georgetown in Guyana.

21 Helen Eisner: And the time period, that was ten months, so ten months prior to April 2018  
22 approximately?

23 District Staffer: Yeah, ten months prior I was with Congressman Blum as his Regional Director  
24 in Dubuque.

25 Helen Eisner: Okay. And what was the time period for you serving as Regional Director?

26 District Staffer: Approximately a year perhaps. I don't know, a year. And then that was elevated  
27 from Staff Assistant or Field Rep. or whatever. And then...yeah.

28 Helen Eisner: So let me just break down those time periods. Let's start from Staff Assistant.  
29 When did you start as a Staff Assistant?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: Yeah, it would be easier to go the other way. So he was elected in November of  
2 2014. I began my work with him in February of 2015. And then, that was in  
3 Cedar Rapids, Iowa. And basically from 2015, the duration of that year, as a Staff  
4 Assistant, and then maybe halfway through that year, Field Rep. And then I was  
5 relocated to Dubuque, where I was a Field Rep/Regional Director. And then that  
6 would have brought us til-

7 Helen Eisner: To the present.

8 District Staffer: To the jungle, and then now.

9 Helen Eisner: Okay. As District Director, what are your responsibilities?

10 District Staffer: I'm responsible for essentially anything that occurs in the congressional district  
11 that's associated with the official office. So we have three offices in the district  
12 and a staff of six other folks that are under my supervision. And then basically  
13 I'm just overseeing the constituent services and the official programming that we  
14 do.

15 Helen Eisner: Okay. And then, sort of comparing that to your time as Regional Director. What  
16 would your responsibilities have been, as Regional Director?

17 District Staffer: Regional Director would have been a micro version of what I'm doing now,  
18 probably just for the Dubuque office and region around Dubuque.

19 Helen Eisner: In your role as Regional Director, who did you report to?

20 District Staffer: District Director John Ferland. And ultimately Congressman Blum.

21 Helen Eisner: And John Ferland, was he District Director during the entire period of time that  
22 you worked for Representative Blum previously?

23 District Staffer: Yes.

24 Helen Eisner: So that's before you left to go to-

25 District Staffer: Correct. Basically the whole...since Congressman Blum's been elected.

26 Helen Eisner: Okay. And where was he based, which office was he based in?

27 District Staffer: The Dubuque office is the head office, so he was based in Dubuque.

28 Helen Eisner: And, how often-

29 Third Party: I'm so sorry! I was just going to check. I'm sorry. I didn't know you were already  
30 in here.

31 Jeffrey Brown: Okay thank you.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: No problem, we're all set.

2 How often does Representative Blum come back to the district?

3 District Staffer: Pretty much every weekend that I'm aware of.

4 Helen Eisner: And when he does travel back to the district, who's responsible for his schedule?

5 District Staffer: It's a combination between two people. District schedule's mostly the District  
6 Director.

7 Helen Eisner: Okay. So currently you'd say you're responsible for his schedule?

8 District Staffer: Yeah. Since I'm new to the role I do take quite a bit of consultation from John,  
9 who was previously in the position.

10 Helen Eisner: Okay. And what is John's current role?

11 District Staffer: He's Chief of Staff in Washington.

12 Helen Eisner: And do you know when he became Chief of Staff in Washington?

13 District Staffer: Some time the end of next year, but I was not here.

14 Helen Eisner: Why did that transition occur?

15 District Staffer: The Chief of Staff previous to him left that, so there was a vacancy. I believe he  
16 returned back to his home state of New Mexico.

17 Helen Eisner: Do you know why...and what was that individual's name?

18 District Staffer: Paul Smith.

19 Helen Eisner: Okay. And do you know why Mr. Smith left the office?

20 District Staffer: I presume because he was growing a family, and so he wanted to be back home.  
21 But that's speculation I guess.

22 Helen Eisner: Okay. When you were Regional Director, how familiar were you with the  
23 Congressman's schedule when he was in the district?

24 District Staffer: Pretty familiar. We have access to it. But unless I'm assigned to him I'm not  
25 looking at it every moment of the day, or following it.

26 Helen Eisner: Okay. And when he was in Dubuque, how often were you assigned to him?

27 District Staffer: I would say...that's a hard question to answer. I couldn't probably give you a fair  
28 percentage. Frequently I guess is the best I can say.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: Maybe I should ask, what does that entail when you are assigned to him?

2 District Staffer: Yeah so if we have a meeting, so I handled immigration and international issues,  
3 and veterans and social security stuff as well for case work, in addition to being  
4 Regional Director. So if we had meetings in healthcare or in veterans issues or  
5 immigration, or if there were visits. I'm from the area, as well, so basically if we  
6 could establish relevance for me being there I showed up, and if it wasn't relevant  
7 then I didn't go.

8 Helen Eisner: And how would he get to those events?

9 District Staffer: Typically he drives, or John would drive him in his vehicle. Congressman Blum's  
10 vehicle.

11 Helen Eisner: Let me ask you, what role have you played in the Congressman's campaign? So  
12 outside of his official office?

13 District Staffer: Very small. That's how I became introduced to Congressman Blum, I volunteered  
14 for his campaign previous to his initial election. I do, in my free time, door  
15 knock, but it's not by any means...I would say less than 3% of my time...

16 Helen Eisner: Okay.

17 District Staffer: ...would be associated with that.

18 Helen Eisner: Understood. To the extent that you know, you told us you play sort of a small  
19 role in the campaign, how does Representative Blum travel to campaign-related  
20 events?

21 District Staffer: I assume in his own car but I have no idea.

22 Helen Eisner: Okay.

23 District Staffer: I mean for a while they had a campaign RV.

24 Helen Eisner: What about John Ferland? Does he play any type of role in the campaign?

25 District Staffer: Yeah, he's involved. But how that is structured, I'm not sure.

26 Helen Eisner: Okay. Involved in sort of a formal way, he has a title, or involved in more of an  
27 informal way?

28 District Staffer: I think, he was initially in the campaign, back before there was a congressional  
29 side of things. So I think he, I would say primarily as a consulting point of  
30 contact.

31 Helen Eisner: Okay. Do you know how the two of them met, Mr. Ferland and the  
32 Congressman?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: I don't actually.

2 Helen Eisner: And how would you describe their relationship just sort of generally?

3 District Staffer: Very typically typical and professional and boring, I guess.

4 Helen Eisner: Okay. Do they socialize outside of official and campaign responsibilities?

5 District Staffer: I don't think so. I think if they're together, maybe they'll grab a drink after  
6 something. But it always would have to have originated with some event that was  
7 official or campaign-related that led them to the end of the day. But I don't think  
8 they meet up on Saturdays and go fishing or anything.

9 Helen Eisner: Understood. In Mr. Ferland's new role, where presumably, correct me if I'm  
10 wrong, he's moved to Washington DC-

11 District Staffer: Mm-hmm (affirmative).

12 Helen Eisner: How often does he now come back to the district?

13 District Staffer: I can't say. I'm here for 30 days, 40 days, so he hasn't been back in 40 days, but  
14 that remains to be seen I guess.

15 Helen Eisner: Understood. Not a great sample size.

16 District Staffer: Yeah.

17 Helen Eisner: Okay. How involved is he now in district-related work and?

18 District Staffer: Initially he was very involved since I'm getting up to speed. But maybe the last  
19 three weeks or so he's really kind of let me start doing most of that. I probably  
20 call him three times a week to discuss meetings and where we should be and that  
21 kind of stuff. But generally less and less as time goes on.

22 Helen Eisner: As far as the Congressman's annual financial disclosure form, so the forms that  
23 he is required to file every year about his personal finances, have you played any  
24 type of role in filing those forms or completing them?

25 District Staffer: Zero.

26 Helen Eisner: Okay. Do you know who does play a role in that?

27 District Staffer: I have no idea. I assume Congressman Blum, but, I mean...

28 Helen Eisner: Based on your knowledge and the work that you've done, what can you tell us  
29 about any outside businesses that the Congressman has a financial interest in or is  
30 involved in.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: I basically know of whatever would be in his bio, is the easiest way to say it. So I  
2 know that he has some role in his traditional business, Digital Canal. And then  
3 the one that's in the news, Tin Moon, I believe that was started...I basically know  
4 public info on that, I don't follow his stocks. I've never looked at his disclosures,  
5 I've never taken much interest in what he does in his personal time.

6 Helen Eisner: Okay. Do you know where Digital Canal is based?

7 District Staffer: Yes, in Dubuque.

8 Helen Eisner: Okay. And how do you know that?

9 District Staffer: It's just there. I've been...I think a lot of the campaign operations. I think that's the  
10 mailing address. So when we first started back in the day, making phone calls  
11 and stuff, he had leased a space proximal to, or he had a space proximal to his  
12 business. I know where it's at.

13 Helen Eisner: Is the campaign space, is it a separate office? In the same building?

14 District Staffer: Yeah, yeah, yeah, but he just has his office.

15 Helen Eisner: Okay. And does he own that building?

16 District Staffer: I have no idea.

17 Helen Eisner: How big was the space, the Digital Canal space, in that building?

18 District Staffer: It's maybe half a floor, and there's four floors. So one eighth.

19 Helen Eisner: Do you know who Digital Canal's employees are, who any of those individuals  
20 are?

21 District Staffer: Two of them, I know reasonably well because they also participated in the  
22 campaign.

23 Helen Eisner: And who are those individuals?

24 District Staffer: Mr. Ed Graham and Monty Alexander.

25 Helen Eisner: Ed Graham. What is his role in Digital Canal?

26 District Staffer: No idea other than he's there.

27 Helen Eisner: What is his relationship with the Congressman?

28 District Staffer: Good. They've known each other a long time. They're business partners,  
29 whatever that means.



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: They're business partners in Digital Canal or in?

2 District Staffer: I have no idea. Whenever I've met Ed it's, "This is my business partner Ed." So,  
3 that's the extent of my knowledge of their relationship as business partners.

4 Helen Eisner: Okay. And in what setting would you be in which he would introduce him as his  
5 business partner?

6 District Staffer: Campaign setting. But I mean it's a small town, so if we're out, if we went to a  
7 fundraiser in the evening or something like that, and Ed showed up, that'd be  
8 another setting.

9 Helen Eisner: Okay. When was the last time that you saw Ed?

10 District Staffer: Maybe two weeks ago.

11 Helen Eisner: And where was that?

12 District Staffer: That was at a fundraising event.

13 Helen Eisner: And that was here in Dubuque?

14 District Staffer: Mm-hmm (affirmative).

15 Helen Eisner: You said they've known each other a long time. Do you know any of the  
16 background of that relationship?

17 District Staffer: Zero, no.

18 Helen Eisner: And do you know what the Congressman's financial interest is in Digital Canal?

19 District Staffer: Formally no. I know he has some stake in it. I don't know what kind or...

20 Helen Eisner: Okay. In your time working for the office, have you seen him go to Digital  
21 Canal, to the offices, to attend meetings?

22 District Staffer: No, never. I've seen him...he's gone to the office, but he doesn't take...I don't  
23 think it's a very active role. I don't think he has a lot of time for that, to be quite  
24 frank. I don't believe he's in as managing it formally or anything like that. But I  
25 have no idea.

26 Helen Eisner: When you've seen him go to the office, when was that?

27 District Staffer: Before I left, I guess. I haven't seen him there since then.

28 Helen Eisner: Okay.

29 District Staffer: He hasn't...I mean I've only been here for 40 days.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: Right. So I guess maybe focusing in that time period when you were regional  
2 director prior to leaving for your other post. How often would you see him go to  
3 the Digital Canal office?

4 District Staffer: I've maybe seen him go there once.

5 Helen Eisner: And do you know why he went on that occasion?

6 District Staffer: No. I think that a guy has an office and he likes his office, you know, and so  
7 that's where he likes to...I don't think people like seven different offices. So no I  
8 think he just went to his office for whatever.

9 Helen Eisner: Okay. So he has a personal office there?

10 District Staffer: Mm-hmm (affirmative), yeah.

11 Helen Eisner: Have you been to that office?

12 District Staffer: I've seen it. I haven't been there for that I guess.

13 Helen Eisner: So you been inside his personal office as part of Digital Canal?

14 District Staffer: He has an office inside of Digital Canal that I've seen. I haven't been inside.

15 Helen Eisner: So you've seen it from the outside.

16 District Staffer: Yes.

17 Helen Eisner: Got it. So you've been inside the Digital Canal offices, and seen that he has an  
18 office there?

19 District Staffer: Yes, yes.

20 Helen Eisner: Okay. And what was the reason that you were at Digital Canal?

21 District Staffer: I think I was running over from the campaign office to talk with Ed or somebody.  
22 I don't know, this was four years ago.

23 Helen Eisner: And how long ago was that when?

24 District Staffer: Campaign 2014.

25 Helen Eisner: 2014.

26 District Staffer: Yeah.

27 Helen Eisner: Okay. Have you been inside the Digital Canal offices since then?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: Yes, but just if I'm picking up Rod or anything like that. So sometimes if we're  
2 leaving for a meeting.

3 Helen Eisner: Okay. So you might pick him up from his office there.

4 District Staffer: Just where he's at. Could be his house, could be his office, yeah.

5 Helen Eisner: And is that picking him up by car? You're driving to the office, is that...just help  
6 me understand. Are you walking from the campaign office to that office?

7 District Staffer: No, no typically, if I'm doing something official and he's going with, I'll just pick  
8 him up to go where we're going.

9 Helen Eisner: Okay.

10 District Staffer: So I'd leave the official office and then stop by there and pick him up and go.

11 Helen Eisner: Okay. So when he's working in the district, like you said, people enjoy their  
12 offices. And correct me if I'm wrong here, you pick him up, he's conducting work  
13 at the Digital Canal office and then you might pick him up to go to an official  
14 event.

15 District Staffer: That would maybe have happened once.

16 Helen Eisner: Okay.

17 District Staffer: I would say when he's in the district he's at home. I mean when he's not with me,  
18 because it's mostly weekends. If there's a longer period of time then that might be  
19 the case, but there hasn't been so I don't really know.

20 Helen Eisner: Okay. Have you seen events related to Digital Canal or meetings related to  
21 Digital Canal on the schedule that you discussed earlier?

22 District Staffer: No.

23 Helen Eisner: Okay. What about meetings with Ed Graham?

24 District Staffer: Hm-hmm (negative).

25 Helen Eisner: You mentioned another individual that you know, I think you said Monty  
26 Alexander?

27 District Staffer: Mm-hmm (affirmative).

28 Helen Eisner: Who is Monty Alexander?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: He's just a very active supporter of Rod's that I think has known Rod for a long  
2 time. So he will often be door knocking and stuff in the last two cycles, or the  
3 last one. Yeah two cycles I guess it's been.

4 Helen Eisner: And you said they've known each other for a long time, do you know how long  
5 they've known each other?

6 District Staffer: No.

7 Helen Eisner: Do you know how they met?

8 District Staffer: No.

9 Helen Eisner: What is Mr. Alexander's role in Digital Canal?

10 District Staffer: I don't know formally. I believe it's sales but that's my guess. No one's every told  
11 me that.

12 Helen Eisner: And why do you think it's sales?

13 District Staffer: He introduces himself as a salesman, but I can't say that that's his role.

14 Helen Eisner: And again, as far as when he's introducing himself, in what context have you  
15 seen him introduce?

16 District Staffer: Campaign.

17 Helen Eisner: Campaign.

18 Jeffrey Brown: You said a minute ago that you didn't think Representative Blum formally  
19 managed Digital Canal. Why did you phrase it like that?

20 District Staffer: I'm using the word formally because I can't know that, like I don't know that. So I  
21 don't want to say, "Yes, he manages Digital Canal." Because I don't know that for  
22 sure. I have no idea. So I'm not trying to say that he manages it behind the scenes  
23 or anything like that if he doesn't manage it. No one's ever came out and said,  
24 "Congressman Blum is formally the manager of Digital Canal." So because of  
25 that I can't speculate on.

26 Jeffrey Brown: Is there another individual who you would think was formally managing Digital  
27 Canal?

28 District Staffer: Probably Ed. I mean that would be the assumption, but it's an assumption. Again  
29 no one's ever spelled it out.

30 Helen Eisner: What about as far as sort of informally? What do you understand Congressman  
31 Blum's responsibilities to be for Digital Canal?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: I have no idea, honestly.

2 Helen Eisner: Do you know how successful of a business it is?

3 District Staffer: Nope. I know nothing about it.

4 Helen Eisner: What about who its clients are?

5 District Staffer: I know they make architecture software or sell that, so I assume it's people who  
6 build things, but I don't know any of their clients that I know of.

7 Helen Eisner: You mentioned earlier something about learning about another company in the  
8 news.

9 District Staffer: Mm-hmm (affirmative).

10 Helen Eisner: Was that Tin Moon?

11 District Staffer: Yep. That's why I assume you were here.

12 Helen Eisner: Well let's talk about Tin Moon.

13 District Staffer: Sure.

14 Helen Eisner: What is Tin Moon?

15 District Staffer: I only know what you would know from the news I guess, but what I understand  
16 it to be from articles is a franchise of another larger reputation-management  
17 company.

18 Helen Eisner: And let me just sort of break that apart. When you say the news, what news  
19 articles are you referring to?

20 District Staffer: I think back in February or January someone sent me a bunch of articles saying,  
21 "hahaha, look at this." Because I was in the jungle. So I was like, "Oh, that's  
22 bad." So I looked at and then there was a "Bleeding Heartland" article that I  
23 thought actually was the most thorough but they're a very biased source against  
24 us. But I was like, "Oh, that's pretty thorough." So yeah, that's where I got most  
25 of my information on Tin Moon.

26 Helen Eisner: Okay.

27 District Staffer: Other than the media at large.

28 Helen Eisner: Who was the individual who sent you those articles?

29 District Staffer: I'd prefer not to say. It's personal. Total personal connection, nothing to do with  
30 anything Rod Blum.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: So is it somebody who-

2 District Staffer: A friend of mine from college.

3 Helen Eisner: Okay, so not somebody who has worked for the Congressman? Or has worked  
4 for the Congressman's campaign?

5 District Staffer: No. He was interested because I was interested, probably.

6 Jeffrey Brown: And not somebody who works for a Representative Blum-affiliated entity?

7 District Staffer: 100% disconnected from everything. It was just in the news and he knew I didn't  
8 get news, so he passed it along.

9 Helen Eisner: Prior to that moment when you received those emails, what did you know about  
10 Tin Moon?

11 District Staffer: Nothing.

12 Helen Eisner: Okay. Do you know where it's based?

13 District Staffer: Nope.

14 Helen Eisner: Do you know who its employees are?

15 District Staffer: No. According to the articles it doesn't have really any but that's just the articles.

16 Helen Eisner: Okay. What is Representative Blum's relationship with Tin Moon?

17 District Staffer: I have no idea.

18 Helen Eisner: What conversations have you had with the Congressman about Tin Moon?

19 District Staffer: None.

20 Helen Eisner: What about with any other members of his staff?

21 District Staffer: Zero conversation.

22 Helen Eisner: What about with John Ferland? Any conversations with Mr. Ferland about Tin  
23 Moon?

24 District Staffer: No. Hm-hmm (negative).

25 Helen Eisner: What about conversations with Mr. Ferland about the articles that you mentioned  
26 earlier that appeared?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: No. It was removed from when I was hired. It hadn't manifested into anything  
2 so...

3 Helen Eisner: What was your reaction to the articles?

4 District Staffer: I thought it was pretty laughable, the coverage. I was actually very disappointed  
5 with the Associated Press because I know people who used to work there. And so  
6 I shot it over to my friend who now lives in New York and I was like, "This is  
7 kind of odd reporting, it doesn't seem very thorough." Because I understood the  
8 article basically, Tin Moon's a franchise. It's really easy to incorporate a business  
9 in Iowa. It'd be very easy to forget about a business you incorporate that wasn't  
10 making any money.

11 For example, I have, technically I have an LLC that I incorporated two years ago  
12 for mini storage sheds. And would that be the first thing on my mind when I'm  
13 thinking about financial disclosures? Not at all. So, I was kind of like, well this is  
14 just a non-story, so I was really surprised that AP picked it up. Because they do  
15 have a good reputation. Mostly I thought it was a non-issue.

16 Helen Eisner: You've mentioned a few times that Tin Moon is a franchise. What is it a franchise  
17 of?

18 District Staffer: So "Bleeding Heartland," which I think is the most thorough one, and they're like  
19 a blog. But they called a bunch of people, it's really interesting. But I don't know  
20 what...they're just a franchise of a national reputation management. I think you  
21 would just buy a license and you can use this software to help sell to clients. I  
22 have no idea as far as the actual structures of it, but that's kind of how the article  
23 spelled it out.

24 So it'd be like, I don't know, if I wanted to open up a Dairy Queen in town, you  
25 just buy into the national franchise. And so I just believe that the license,  
26 according to the article, the license, it was bought in that year and then probably  
27 that's why it accrued a value. But it wasn't active, so that's why it wouldn't be  
28 something on someone's mind.

29 Helen Eisner: Okay. That licensing sort of franchise piece, do you know any of the individuals  
30 who have been involved in the franchising or licensing related to Tin Moon?

31 District Staffer: As far as here? No. I think on the article there's a link to two other people in the  
32 country that use the same software or whatever it is, have bought licenses, and so  
33 I clicked on that, but I have no idea what the involvement is here, who buys it or  
34 anything like that.

35 Helen Eisner: Do you know who Tin Moon's clients are.

36 District Staffer: No. The website for the article, again, said it's people who received reputation  
37 management, but I've never met any Tin Moon client.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: Have you been to Tin Moon's website?

2 District Staffer: I don't think so. I can't say for sure but I don't believe I have.

3 Helen Eisner: Okay. What do you know about a photograph that appeared on Tin Moon's  
4 website?

5 District Staffer: I know that Rod Blum's photograph showed up on the website if that's the one  
6 you're thinking of.

7 Helen Eisner: Okay. And do you know why that happened?

8 District Staffer: I have no idea but I don't think it was out of any malicious origin. I imagine,  
9 people around here probably just copy and paste things off Google when they're  
10 slapping together a website. That's just my speculation. I laugh because I can't  
11 believe that, it's just funny to me. But yeah.

12 Helen Eisner: What conversations have you had with the Congressman about that picture that  
13 appeared on the website?

14 District Staffer: None. I haven't talked about Tin Moon with Congressman Blum.

15 Helen Eisner: Okay. What about with John Ferland?

16 District Staffer: I haven't talked about Tin Moon with John Ferland.

17 Helen Eisner: Okay.

18 District Staffer: This is all my speculation in the jungle. I'm sitting here reading this in Guyana  
19 like, "Oh my gosh, this is hilarious" kind of thing.

20 Helen Eisner: Okay. Eventually for calendar year 2016 there were some amendments to the  
21 Congressman's financial disclosure form.

22 District Staffer: Okay.

23 Helen Eisner: Were you involved in those amendments?

24 District Staffer: No.

25 Helen Eisner: Do you have any knowledge of those amendments outside of the news articles  
26 that you've read.

27 District Staffer: I honestly don't know anything about his financial disclosure forms. I've never  
28 looked at them, I don't know if I have access to them, if they're public or not.  
29 Probably they are but I have no...



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: The Tin Moon website initially listed the Congressman as the CEO, the Chief  
2 Executive Officer, of Tin Moon. What can you tell us about that role that he  
3 played for Tin Moon?

4 District Staffer: I can't. I don't know at all.

5 Helen Eisner: Okay.

6 District Staffer: I assume, based on the articles, that it wasn't an active role because it doesn't  
7 sound like the thing was up and running by any means. But I have no idea. Based  
8 on his schedule I don't think he could possibly have time to run a company.

9 Jeffrey Brown: Why do you say that?

10 District Staffer: He's very busy. I mean we schedule him pretty much every minute he's back in  
11 the district, so. Yeah, it's exhausting. And he comes back every weekend.

12 Helen Eisner: Monty Alexander, that's somebody that we've talked about. He was involved in  
13 Digital Canal. What conversations have you had with Mr. Alexander about Tin  
14 Moon?

15 District Staffer: None.

16 Helen Eisner: Has he ever mentioned Tin Moon to you?

17 District Staffer: No.

18 Helen Eisner: He has sort of publicly stated in some postings that he's involved in the company.

19 District Staffer: Okay.

20 Helen Eisner: Do you have any type of reaction to that?

21 District Staffer: No. I'm not surprised. Monty's a very active poster on Facebook. But I don't have  
22 any opinion of that. I don't care, honestly, about where people go to work.

23 Helen Eisner: So Ed Graham is also involved, at least as far as the paperwork in Tin Moon. Is  
24 there a reason that these same people, Monty Alexander, Ed Graham, and the  
25 Congressman, all three individuals who we've talked about, have been involved  
26 in Digital Canal, so the other business that the Congressman is involved in. Why  
27 would Monty Alexander and Ed Graham also be involved in another business  
28 venture with the Congressman?

29 District Staffer: I have no idea but I think when people do business together they trust the people  
30 they do business together. I have no idea what Monty's role, I mean I don't think  
31 it's...he's a sales guy as far as I know at Digital Canal. So other than what he's  
32 posting on Facebook, which I'm not a close follower of, yeah I don't think it's  
33 some conspiracy together to start a secret company or whatever the allegations

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 are. I think Rod's been involved in a number of businesses, and probably Ed has  
2 been involved in a number of those businesses, I'm guessing. So that probably  
3 would make sense. I mean if I was going to start a business I would probably  
4 start a business with people I started former businesses with, or who were  
5 involved in my previous businesses.

6 Helen Eisner: So as we understand it, Tin Moon is based in that same office location that you  
7 described where Digital Canal is based, and where the campaign at least at some  
8 point in time had office space.

9 District Staffer: Yeah, and the campaign was there for maybe a month, and then they got a  
10 different office space downtown here.

11 Helen Eisner: Okay.

12 District Staffer: And they were always separate. You know, there's doors.

13 Helen Eisner: Let me ask you this. Have you picked up the Congressman at that office building  
14 in the time since you've been back?

15 District Staffer: I don't know. I don't think so. Maybe once. Mostly I think we've left from his  
16 house. So I can't say for sure.

17 Helen Eisner: Okay. When you have been to that building, have you seen any type of Tin Moon  
18 office space in that building?

19 District Staffer: Hm-hmm (negative).

20 Helen Eisner: No. Okay. Is it possible that the Congressman-

21 District Staffer: I don't think Tin Moon exists on an operational way. I don't know, but I literally  
22 think it's just somebody bought a franchise license and then incorporated a  
23 business with the state.

24 Helen Eisner: Okay.

25 District Staffer: At least, from the coverage. I have no idea if they're more operational than they  
26 were back when the filing errors occurred, but I think it's like a 0.0001% of  
27 anything that's going on with his businesses or the businesses that he started or  
28 whatever.

29 Helen Eisner: Okay. Tin Moon's website says that they have 11,000 clients. Do you know why  
30 it would say that?

31 District Staffer: That's where "Bleeding Heartland" spelled out the franchise thing. So when you  
32 buy a franchise license, like McDonald's in Dubuque can say, "We've sold a  
33 billion hamburgers." Did McDonald's in Dubuque sell a billion hamburgers? No.  
34 But they are a franchisee or they have a license which gives them access to the

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 brand, where then you can say that "I've sold a billion hamburgers." I assume it's  
2 the same thing, where if you buy a franchise you're buying into this national or  
3 international product, and then you can claim, because it's the same thing, the  
4 clients of that brand.

5 Helen Eisner: Okay. And what conversations have you had besides reading the "Bleeding  
6 Heartland" article about that, about the number of customers that is advertised on  
7 the website?

8 District Staffer: I haven't had any.

9 Helen Eisner: Okay. Let me show you a copy of the website. This is sort of an archived copy,  
10 pulled back from February 7, 2018, so it's possible that you were still out of the  
11 country.

12 District Staffer: February 7, 2018? Yeah I was not here.

13 Helen Eisner: Just so you can see that. Again this is Tin Moon's website pulled from February  
14 7, 2018. There is a picture on this first page. Do you know who that individual  
15 is?

16 District Staffer: John Ferland.

17 Helen Eisner: Okay. And the text says, "John Ferland representing Digital Canal Corporation."

18 District Staffer: Mm-hmm (affirmative).

19 Helen Eisner: What do you know about this video?

20 District Staffer: Nothing other than, I don't believe that John works at all for Digital Canal  
21 Corporation. That's it. I don't know.

22 Helen Eisner: Why does it say that he might be representing Digital Canal Corporation?

23 District Staffer: I have no idea.

24 Helen Eisner: Okay.

25 District Staffer: But if it's a website I think anybody can put anything where they want it. I don't  
26 think John went in there and created a website with this video. That'd be a guess.

27 Helen Eisner: What conversations have you had with John about this video?

28 District Staffer: None.

29 Jeffrey Brown: Why did you say that you don't think John represents Digital Canal?

30 District Staffer: Because he doesn't work for them as far as I know. He's in Washington DC.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: So why would this say he would be representing Digital Canal?
- 2 District Staffer: Probably because somebody typed it on there? I don't know. I have no idea.  
3 Yeah, I just think it would be kind of a just slap together a website kind of, if you  
4 bought a franchise and you need to get something up and running, get a video up,  
5 "John can you help me with a video?" I have no idea.
- 6 Helen Eisner: Okay. Have you seen any news coverage of the fact that this video appeared?
- 7 District Staffer: Mm-hmm (affirmative), yeah.
- 8 Helen Eisner: Okay. And what was your reaction to that coverage?
- 9 District Staffer: Again I was laughing.
- 10 Helen Eisner: Laughing why?
- 11 District Staffer: Because I really don't think it's a significant concern. I think what the news wants  
12 people to think is that "John Ferland was paid millions of dollars to create a video  
13 in his free time for Congressman Blum, and that's a conspiracy, and we didn't  
14 report it." And I think in reality, probably it was like, oh someone ask John. "Hey  
15 John I need to make a testimonial video, I'm trying out this thing." "Okay." And  
16 that was probably the extent of the conversation or thought. Speculation,  
17 guessing. But I don't think it was some organized scheme. So that's why it's  
18 funny to me. Just making light of the obnoxiousness of the coverage on this  
19 story, and how I think it went down in my head, based on what I know of John  
20 Ferland or other people.
- 21 Helen Eisner: What do you mean by that, what you know of John Ferland?
- 22 District Staffer: Just, I think that they're very light-hearted people. I don't think that they...no one  
23 goes to work with a plan or a scheme, I don't think anyone's trying to make a  
24 million bucks, but he's a nice guy so if someone says, "I'm making a mock-up" or  
25 something like that, "Yeah, sure, no problem." If someone came up to me and  
26 said, "[District Staffer], I'm making a client testimonial for my project at school  
27 or my business, can you pretend to be a dramatized client?" "Okay, sure, no  
28 problem, I don't care." That would be the extent of the thought I would put into  
29 that. So that's what I anticipate John would have thought.
- 30 Helen Eisner: To pretend to be a client of a company.
- 31 District Staffer: Mm-hmm (affirmative). Just to make a testimonial. I don't think anything would  
32 have been spelled out, I can't imagine there'd be ten pages of contracts and  
33 saying, "You're going to have this script." I just say hey, there's the video, we  
34 need to make it, slap together a website.
- 35 Helen Eisner: Okay. And would John have been paid to do that?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: I have no idea but I doubt it.

2 Helen Eisner: Okay. Has John participated in anything like this for other companies?

3 District Staffer: I have no idea.

4 Helen Eisner: Have you watched this video?

5 District Staffer: I don't think so. Maybe. I don't remember.

6 Helen Eisner: Okay.

7 District Staffer: I watched a lot of videos about the coverage, I mean about the story, but I don't  
8 know if this was in that or not.

9 Helen Eisner: Right. And when was it that you watched those videos on average?

10 District Staffer: In the jungle, and whenever it broke.

11 Helen Eisner: When you came back, was this an issue that you have had to speak to the press  
12 about?

13 District Staffer: Hm-hmm (negative).

14 Helen Eisner: Was it an issue that you raised with anyone in the office as far as your transition  
15 back into the office?

16 District Staffer: Hm-hmm (negative).

17 Helen Eisner: Have you ever been in a position where the Congressman asked you to perform  
18 for Digital Canal?

19 District Staffer: No.

20 Helen Eisner: How about for any of his outside business interests?

21 District Staffer: Never. No he would never do that.

22 Helen Eisner: Any why do you say that?

23 District Staffer: That would be blatantly wrong. And we don't have time, frankly. I think that the  
24 congressional side of things is rather exhausting and I don't know how active Rod  
25 is in the businesses he associates with, but I think that he trusts the staff to  
26 operate them, or if they're managed. I have no idea, but no, Rod would never ask.

27 Helen Eisner: How often do John Ferland and the Congressman communicate?

28 District Staffer: Probably daily.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

- 1 Helen Eisner: And is this the type of thing that Mr. Ferland would have told the Congressman,  
2 that if he participated in this type of video?
- 3 District Staffer: I don't know. I don't know if, maybe if it wasn't given a lot of weight initially.  
4 Like I would not tell Rod Blum, "Hey I just did dramatized client testimonial"  
5 just out of the blue. Now that it came out, probably they had a conversation, but I  
6 don't know. I don't know. There's a lot going on in a day, so I couldn't tell you.
- 7 Helen Eisner: What kind of relationship do Mr. Ferland and Ed Graham have?
- 8 District Staffer: I think they have a very friendly relationship. Ed's a great guy. You know I see  
9 him in church, and genuine person. I think everyone around here knows each  
10 other's very humbly. I do this kind of bob kind of thing, because that's kind of  
11 Dubuque. Yes, it would have been not abnormal for them to have any sort of  
12 genuine relationship or friendship. I don't know though.
- 13 Jeffrey Brown: I think you said on a couple of occasions, you know the Congressman's schedule  
14 is pretty packed. And I think you also said you either help with the schedule or  
15 you're certainly aware of the schedule.
- 16 District Staffer: Right.
- 17 Jeffrey Brown: Would the schedule list things that are not official side, not congressional? In  
18 other words, would it list personal events or business-related events?
- 19 District Staffer: Hm-hmm (negative).
- 20 Jeffrey Brown: So if you were looking at the schedule on any given day, would you be aware of  
21 what the Congressman is doing outside of-
- 22 District Staffer: No.
- 23 Jeffrey Brown: His official activities for the day?
- 24 District Staffer: No, not my business, frankly.
- 25 Jeffrey Brown: The way that you would come to know that is conversations about what he's  
26 doing before or after you see him?
- 27 District Staffer: Yeah, but we probably wouldn't. I don't ask what he's doing at his house when I  
28 pick him up on Monday.
- 29 Jeffrey Brown: But the schedule doesn't have his activities, his personal activities, that you have  
30 access to.
- 31 District Staffer: No. No. Hm-hmm (negative).

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: Just to go back to your understanding that the relationship between Ed Graham  
2 and Mr. Ferland was friendly, where have you seen them interact?

3 District Staffer: Just in the campaign season. Different functions. If there's a rally Ed's always  
4 supportive. Something like that.

5 Helen Eisner: Have you seen Mr. Ferland at the Digital Canal offices?

6 District Staffer: Never, hm-hmm (negative).

7 Helen Eisner: What about in that campaign office that you mentioned? I know it was a short  
8 period of time.

9 District Staffer: No, I was just...at that point I was like a volunteer, major or small volunteer, so I  
10 wasn't there 100% of the time. I wasn't ever on staff of the campaign. So I was  
11 just making calls, I never saw John. Not in that office. When we moved down  
12 here more toward the election, yeah, but that was summer of 2014.

13 Helen Eisner: This video that we've been talking about was removed from the website.

14 District Staffer: Mm-hmm (affirmative).

15 Helen Eisner: Why was it removed?

16 District Staffer: I have no idea, but probably because of the bad press.

17 Helen Eisner: Okay. Has there continued to be bad press about this issue?

18 District Staffer: I haven't heard about it since I've been back.

19 Helen Eisner: Okay. And are you involved in press-related matters?

20 District Staffer: Not really. I won't say formally because that's not a good word I guess, but we  
21 have a Communications Director, and so if there's something that I think needs  
22 press coverage I'll email her. If I think there's probably going to be a spin on  
23 something, like "Oh this is probably what they'll do, maybe pitch it this way" or  
24 something like that. But I don't write them, I don't release them. I don't have the  
25 media contacts.

26 Helen Eisner: Okay. And who's that Communications Director?

27 District Staffer: Alexah Rogge, in our Washington office.

28 Helen Eisner: I'm going to take that back and move this other picture. This is a printout of a  
29 YouTube site.

30 District Staffer: Mm-hmm (affirmative).

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: The user name for the creator of the YouTube account is Rod Blum. What do you  
2 know about this account?

3 District Staffer: Nothing.

4 Helen Eisner: Okay. Does the Congressman have a YouTube account?

5 District Staffer: I think his campaign does, I don't know if his official office does or not. Probably  
6 we do. I don't know if he does personally, if this is him or if one of his employees  
7 operates his YouTube. I'm not sure.

8 Helen Eisner: Okay. This video, the first video that's listed, so all the way to the left, that is  
9 titled "Tin Moon SEO" from one year ago, 269 views. Have you seen that video?

10 District Staffer: Hm-hmm (negative).

11 Helen Eisner: Okay. That's, sorry, just for the recording, that's a no.

12 District Staffer: No. Yeah.

13 Helen Eisner: And what coverage have you seen about this video?

14 District Staffer: This video? None.

15 Helen Eisner: None.

16 District Staffer: Hm-hmm (negative).

17 Helen Eisner: Okay. Do you know who the woman is in that video?

18 District Staffer: I think her first name is Kristen but I don't know her last name.

19 Helen Eisner: Okay. Where have you met her?

20 District Staffer: Again, in campaign functions. I think she works at Digital Canal.

21 Oh no, she's on...there's a couple campaign commercials I think she's been on.

22 Helen Eisner: Campaign commercials for the Congressman?

23 District Staffer: Mm-hmm (affirmative). I think.

24 Helen Eisner: So is she a volunteer for the campaign then?

25 District Staffer: Maybe. I have no idea. Maybe she goes knocking, I don't know.

26 Jeffrey Brown: But you said you think she's an employee at Digital Canal.



CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: Mm-hmm (affirmative), yeah, I'm pretty sure.

2 Helen Eisner: Okay, and why do you think that?

3 District Staffer: We have a campaign commercial, I believe this is the one where, you have to  
4 look it up online, but a couple years back, maybe second election, so before that.  
5 I think she was in an ad about maternity leave, that she worked for Blum, and  
6 that he gave her extended maternity leave or something along those lines. So I  
7 believe in that video it talks about her being an employee of Rod's.

8 Helen Eisner: And this is, so in the video, she talked about receiving maternity leave at Digital  
9 Canal?

10 District Staffer: I think so. I don't remember if it mentions Digital Canal or not, but it says she's  
11 an employee of...I think that whole point of the video is to say that Rod's a good  
12 boss. It somehow draws that connection, I don't remember when or how?

13 Helen Eisner: And approximately when was that video?

14 District Staffer: It's either first campaign cycle or the second election? I'm sure it's still on  
15 YouTube.

16 Helen Eisner: Okay. And besides that video, do you have any other basis for believing that she  
17 works for Digital Canal?

18 District Staffer: No, I haven't seen her work there I guess, but I recognize her. I think her name is  
19 Kristen.

20 Helen Eisner: Kristen. Do you know her last name?

21 District Staffer: I don't, I don't. I'm not really good with names.

22 Helen Eisner: Okay. Has she been involved...well when was the last time you saw her?

23 District Staffer: I don't know.

24 Helen Eisner: Are any other members of her family involved in the campaign?

25 District Staffer: I don't know. I don't know. I think she's married, but I don't know who she's  
26 married to. I don't believe so. Typically I think, other than Monty, you know,  
27 coming over to make phone calls, there's like campaign life and typically the type  
28 of people that sell architectural software don't enjoy campaign life, so I don't  
29 think there's a huge amount of crossover.

30 Helen Eisner: What about any other Digital Canal employees? We've talked about Monty,  
31 we've talked about Ed Graham, we've talked about this woman Kristen. Have you  
32 interacted with any other employees of Digital Canal?

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 District Staffer: I don't know any other ones that I can think of their names. I mean there's people  
2 in the office building that I've seen, or people come out and say "I work for  
3 Digital Canal" and stuff like that.

4 Helen Eisner: Come out where and say that?

5 District Staffer: To campaign functions. I mean obviously they're very supportive of their boss,  
6 he's a good guy to work for, and they like, "Oh I support Rod." I don't know if  
7 they've been to the offices, not on the official congressional side, but if they've  
8 been to the campaign offices or if there's a rally where the Governor's here in the  
9 evening. Yeah, it's probably common that one or two would show up. I don't  
10 know them beyond that.

11 Helen Eisner: Okay. When was the last time you came across someone in that circumstance  
12 who identified themselves?

13 District Staffer: Last election.

14 Helen Eisner: Okay.

15 District Staffer: I mean I've been gone for ten months, so I haven't done...

16 Helen Eisner: The Congressman, he amended his financial disclosure form to talk about a  
17 financial interest in Tin Moon. Did you have any role in that amendment?

18 District Staffer: Hm-hmm (negative). I, again, no involvement with financial disclosures.

19 Helen Eisner: Okay. What about conversations with anyone in the office about that  
20 amendment?

21 District Staffer: Frankly I didn't know what happened. But no I haven't had any conversations.

22 Helen Eisner: Okay. Besides Digital Canal and Tin Moon, what other businesses is the  
23 Congressman involved in?

24 District Staffer: I know he's former CEO of Eagle Point Software, I think he sold that. I think part  
25 of Digital Canal came from that, it's like a division. But other than those two I  
26 don't know of any. I've never looked up his name on the Secretary of State's  
27 website or anything to see what you could find there. So those two, I guess.

28 Helen Eisner: Okay. What about any type of real estate investments? What real estate?

29 District Staffer: He would mention that he's a real estate developer but I don't know anything  
30 about if those companies are active. Like if he was talking to someone who did  
31 real estate, "Oh yeah, I did real estate development." Or "I'm a developer." But I  
32 have no idea.

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Helen Eisner: So that was in the campaign context when he would mention that, or where have  
2 you seen him mention that?

3 District Staffer: Just like if I were to introduce myself with you all, and you said you're in real  
4 estate. "Oh yeah, I did real estate." Just very conversationally I guess.

5 Helen Eisner: Okay. What do you know about the types of real estate that he has or is invested  
6 in.

7 District Staffer: Nothing.

8 Helen Eisner: There's a company, and I'm going to pronounce this incorrectly, so I will also  
9 spell it. But it's Salto de Fede. S-A-L-T-O D-E F-E-D-E. Do you know anything  
10 about that company?

11 District Staffer: Hm-hmm (negative). Never heard of it, ever.

12 Helen Eisner: Okay. What about, again, another mispronunciation, but bear with me. Doppio  
13 Giu, which is D-O-P-P-I-O G-I-U. Do you know that company?

14 District Staffer: No.

15 Helen Eisner: What about any other business interests with Ed Graham that the Congressman  
16 might be involved in?

17 District Staffer: No, as far as I know Ed works at Digital Canal.

18 Helen Eisner: Okay. Is Ed Graham involved in any of the real estate development that the  
19 Congressman has mentioned-

20 District Staffer: I don't know anything about Rod's real estate development at all. I don't think,  
21 but that'd be just me guessing.

22 Helen Eisner: Has he ever talked to you about any properties that he's invested in in Asbury, I  
23 might be pronouncing that incorrectly A-S-B-U-R-Y?

24 District Staffer: Asbury, yeah.

25 Helen Eisner: Asbury, Iowa.

26 District Staffer: No.

27 Helen Eisner: No. Okay. Sort of based on our conversation about Tin Moon, is there anything  
28 else that you think that we should know?

29 District Staffer: I don't think there's anything that I know that you don't know from the media, so  
30 I think you have all the facts. I would probably emphasize that it's not really

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 a...I'm very surprised that people flew out here to come ask about that, to be quite  
2 frank. It's kind of really not a big thing, I don't think. But I don't know.

3 Helen Eisner: At any point has anyone reached out to you to discuss our Office of  
4 Congressional Ethics review and this investigation?

5 District Staffer: No. Hm-hmm (negative).

6 Helen Eisner: Have you had any conversations with the Congressman about the investigation.

7 District Staffer: No.

8 Helen Eisner: What about with John Ferland?

9 District Staffer: No.

10 Helen Eisner: Have any attorneys reached out to you to talk about the investigation?

11 District Staffer: No.

12 Helen Eisner: Okay. Is there anyone else that you've communicated with about the fact that we  
13 were coming out here to talk to you?

14 District Staffer: Maybe a personal friend, just saying, "Hey, I've got to go meet with lawyers this  
15 morning about some stupid thing." But that's about it.

16 Helen Eisner: A personal friend who's connected to the Congressman?

17 District Staffer: No connection.

18 Helen Eisner: Okay. Do you have any other questions?

19 Okay, I think we're going to go ahead and stop the recording.

20 District Staffer: Okay.

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
4	13	Change "next year" to "last year"	Currently its not logical or correct
7	3	Remove Typically	Redundant and causes confusion of meaning
11	13	replace "I cant say that... his role w/ I dont know for sure"	Current form creates an insinuation which was not my intention
14	6	Remove "who now lives in New York"	I dont want to jeopardize the reputation or career of my friend. Where they live is not relevant and will not impact the content of this transcript. nor does said insinuation reflect reality
17	9	Insert after "month ": in a separate office in the same building"	Currently it makes it sound like all three entities shared office space — which is NOT true.
17	<del>20</del> 22	Strike "out" insert "the"	Does it make sense
19	3	strike "would" insert "was"	Grammer
21	10	Strike from "very" through "thing"	It makes exactly sense as written. I was trying to say "People know each other, its a small town"

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:

June 13, 2018

# **EXHIBIT 16**



## ***GetMePlacement, LLC***

Double Corporate Level 25 Agreement and Software License Agreements

May 11, 2016

Ed Graham  
Digital Canal Corporation and  
Tin Moon Corporation  
2728 Asbury Road  
Dubuque, IA 52001

Re: Level 25 Opt #1: DigitalCanal.com  
Level 25 Opt #2: DigitalCanalStructual.com


Dear Ed Graham:

Thank you for selecting GetMePlacement.com to optimize your website. This Optimization Agreement is between GetMePlacement, LLC (GMP) and Digital Canal Corporation (DCC). We have outlined below what GMP will be doing and what is required of the DCC in order for this partnership to be successful.

### **GMP Responsibilities, per each Level 25 Optimization:**

- \* Optimization of your home page plus one hundred additional pages. Any Additional pages needed to properly promote the phrases will be added at no additional charge
- \* Keyword research and analysis to determine the best phrases to target
- \* Unique on-page content to compliment newly written HTML coding
- \* Traffic statistics available for performance monitoring
- \* Build, optimize and host twenty-five 2-page micro sites for strategic placement
- \* Monthly monitoring of your site to ensure that it stays at 90-100% compliant with current search engine criteria
- \* Unlimited consultations with our President upon request
- \* Up to 12 press releases written and submitted over the course of one year upon request
- \* Guaranteed multiple listings on the front page of the major search engines within 90 days of uploading the optimization
- \* If it is determined that your site has been compromised (ie: virus, hacked, etc.), your placement will take longer to obtain, and may require further action to be taken.

**Continued**

6401 W. Eldorado Pkwy Suite 318- McKinney, Texas 75070 - 

## Page 2 - Double Corporate Level 25 and Software License Agreements

### Client Responsibilities, per each Level 25 Optimization:

- \* Provide GMP with direction and focus of the campaign
- \* Provide GMP with FTP access if GMP is to upload the optimization
- \* Be willing to adjust design elements of website that may hinder full optimization (ie: website format/platform, duplicate content, images, call-to-action, etc.). DCC agrees to make recommended changes, or pay a nominal fee to GMP to make said changes.

### DEFAULT:

If GMP fails to perform the optimization within 20 business days after the initial payment is made and questionnaire received, DCC may request a refund. \*

\* DCC understands that if its website(s) has been compromised, this will likely hinder the optimization process and results. If the compromise is determined too great, other actions may need to be taken. Client agrees to make recommended changes to website. If they are not changed, the guarantee is voided.


If Client fails to pay any payment within 10 days of its due date, GMP may terminate their on-going optimization service. DCC understands that if this service has been terminated, the ranking in the search engines will fall.

Client agrees not to overwrite the optimization performed by GMP. If this occurs, the search engine placement guarantee is voided and there may be a charge of up to \$50.00 per page to re-optimize the website.

### PRICING:

Client agrees to pay GMP the sum of \$50,000.00 for the initial optimization work of the referenced two sites along with a non-refundable deposit of \$15,000.00 for the Software License Agreement. Upon receipt of the \$65,000.00 GMP will begin work on both optimizations. DCC will owe a balance of \$86,875.00 prior to the training class, tentatively scheduled for June 22, 2016.

Continued

6401 W. Eldorado Pkwy Suite 318- McKinney, Texas 75070 - 



### Page 3 - Double Corporate Level 25 and Software License Agreements

This End User Software License agreement is between GetMePlacement.com (GMP) (Licensor) and Tin Moon Corporation (Licensee). The End User Software License is good for 50 End-User clients. An End User Client is defined as: A single Tin Moon Corporation client whose site is optimized by Tin Moon. Tin Moon clients (resellers) may resell Tin Moon website optimization services to their sub-clients; such sub-clients shall not be counted as additional End Users with regard to this End User Software License.

By way of example:


- 1) Single sale. If Tin Moon sold Graham's Style Store an SEO package then one End User shall be counted.
- 2) Reseller sales. If Tin Moon sells website optimization services to resellers who then resells Tin Moon website optimization services to their sub-clients this is still counted as only 1 End User License even if the Reseller sells 2 or 50 or 100, etc. of their sub-clients.

Products, Services, Pricing and Special Terms and Conditions for the Tin Moon "Web Based Tracker Software License" are below. The Tin Moon "Web Based Tracker Software License" is defined as: Tin Moon's cloud based operations License software from GMP to operate as a GMP Affiliate in perpetuity:

#### PRODUCTS INCLUDED:

1. The "Software License for the Web Based Tracker System" branded for Tin Moon Corporation includes the following features:
  - a. Client data input and tracking
  - b. Page optimization input
  - c. Keyword phrase input and monthly submissions
  - d. Billing module for automated client credit card billing
  - e. Automated payment confirmation email tool (credit card only)
  - f. Automated client optimization monitoring tool and notification of non-compliance
2. 5,000 sales leads – businesses paying per click in Google
3. Optimization Test Tool branded for Tin Moon
4. Whois domain information reporting tool branded for Tin Moon
5. Contact Manager tool for management of all of client's leads
6. Sales assistance closing your first sale
7. Build template-based site for Tin Moon, optimized to 95-100% for Iowa, Illinois and Wisconsin.

Continued

6401 W. Eldorado Pkwy Suite 318- McKinney, Texas 75070 - 

**Page 4 - Double Corporate Level 25 and Software License Agreement**

**Web Based Tracker System Software License SERVICES INCLUDED:**

1. Complete setup and implementation of all products listed above
2. Sixteen hours of programming time to implement Tin Moon's payment gateway for automated credit card processing through Authorize.net
3. Non-exclusive search engine optimization training and SEO sales training performed in-person by Todd McCally and Justin McCally during a 3 day period at GMP's offices; Opt implementation training by Jeff Nelson at GMP's office or via webinar
4. Tracker System Software License training by Todd McCally and/or Cassie Feo
5. Updates to Tracker System Software License for one year
6. Updates to Optimization Test Tool for one year
7. Telephone support for SEO and/or technical questions for one year

**PRICING:**


Tracker System Software License and Training is offered for a cash discounted price of \$130,000.00 and is good for 50 End-Users. Tin Moon will pay a non-refundable deposit of \$15,000.00 for the Tracker System Software License and the special affiliate price of \$50,000.00 initially for the Double Corporate Level 25 Optimizations. The amount of \$65,000.00 will be credited off the total amount of \$151,875.00. Therefore, total amount of \$86,875.00 is due two weeks prior to Software License Training.

Tracker System upgrades are available as follows:

- VIP (increase in End Users from 50 to 100) is a \$50,000.00 cash upgrade. However, Tin Moon will not be required to pay the \$50,000.00 to upgrade until or unless its gross revenues in the previous 12 months are \$500,000.00 or higher;
- VIP Plus (increase in End Users from 100 to 250 users) is a \$100,000.00 cash upgrade or \$50,000.00 cash upgrade on top of the VIP 100 End User upgrade.
- After purchasing 250 End Users for \$150,000.00 no further End User upgrades are necessary, and the number of End Users is then unlimited and requires no additional fees.

Tracker System Software License is fully transferrable for a \$5,000.00 fee which includes training of new licensee. If no training is needed, there is no fee to sell this to another party.

**Continued**

6401 W. Eldorado Pkwy Suite 318- McKinney, Texas 75070 - 



## Page 5 - Double Corporate Level 25 and Software License Agreement

Tin Moon may hire GMP to perform optimization services as follows: Level 1 - \$250.00 each; Level 2 - \$500.00 each; Level 3 - \$750.00 each; Level 4 - \$1,000.00 each; Level 5 - \$1,250.00 each plus press releases: Level 10 - \$3,000.00; Level 15 - \$4,500.00 each; Level 25 - \$10,000.00 each; Level 50 - \$20,000.00 each; Level 100 - \$40,000.00 each; Level 150 - \$60,000.00; Level 200 - \$80,000.00. Content is an additional cost of \$20/per page. Press release articles are also roughly \$20/per page plus PRWeb fees of approximately of \$99.00 per press release.

### ON-GOING COST:

1. Software updates to Tracker System, Tracker Hosting/Nightly Backups and Optimization Test Tool maintenance charged month thirteen – not to exceed \$1,000.00 per year, based on \$10/client per year, \$500.00 minimum.
2. Technical support beginning month thirteen for \$50.00/hr, if requested
3. After the initial three day training period, SEO sales training is available for \$150.00/hr plus expenses, if requested

### SPECIAL TERMS AND CONDITIONS:

1. SEO and Tracker System Software License training shall be completed within 20 working days after contract signing and/or full payment has been made.
2. Functional **Web Based** Tracker System Software License, branded for Tin Moon will be complete within 15 working days after contract signing
3. Technical and SEO support questions will be responded to within 4-6 business hours, if not immediately
4. In the absence of Justin McCally for SEO and/or technical support after the initial training period, Todd McCally, Jeff Nelson and/or Cassie Feo will be available
5. If at any time a monthly payment is not made within ten days of its due date, access to the Tracker system may be limited at the sole discretion of GMP
6. This contract does not create a partnership or joint venture between GMP and Tin Moon. GMP agrees not to interfere with the relationship between Tin Moon and its clients, and not to use any information received about Tin Moon's clients to further GMP's business interests.

Continued


6401 W. Eldorado Pkwy Suite 318- McKinney, Texas 75070 - [REDACTED]

**Cont Page 6 - Double Corporate Level 25 and Software License Agreement**


7. GMP agrees not to interfere with, disrupt or turn off Tin Moon's Tracker System Software License without notifying Tin Moon that GMP intends to do so with sufficient notice.
8. In the event that GMP ceases to exist or stops operations in any way then GMP grants Tin Moon Corporation a license in perpetuity to its Web Based Tracker System Software License so Tin Moon may continue its operation.
9. Venue for any dispute arising under this contract is Collin County, Texas. The laws of the state of Texas, without regard to its conflicts-of-laws provisions, shall govern this contract.

GetMePlacement.com (Licensor)  
6401 W. Eldorado Pkwy, Suite 318  
McKinney, TX 75070


Tin Moon Corporation (Licensee)  
2728 Asbury Road  
Dubuque, IA 52001



Todd McCally, President  
GetMePlacement.com



Ed Graham  
Digital Canal Corporation and  
Tin Moon Corporation

6401 W. Eldorado Pkwy Suite 318- McKinney, Texas 75070 - 

# **EXHIBIT 17**

**From:** egraham@[REDACTED]  
**To:** "Todd McCally"  
**Subject:** RE: Discussion next week ...  
**Date:** Wednesday, February 21, 2018 10:35:54 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Todd, thanks for understanding. Politics is TRULY despicable and this crap (will fill you in) is why accomplished people don't run. Terribly sad for America really.

Anyway, Friday will not work. Next week I have Mon, Tues. or Wed. after 2:00 are all good for me if this works for you?

Thank you, Todd.

---

**From:** Todd McCally [REDACTED]  
**Sent:** Tuesday, February 20, 2018 8:29 PM  
**To:** egraham@[REDACTED]  
**Subject:** Re: Discussion next week ...

Hi Ed,

No apology necessary. Clearly something is "a-foot" and you guys needed to huddle up.

At this point, I'm pretty open Friday morning. I have a tentative call around 10am or 11am on Friday. If you are okay with it, I'll call you Friday morning when I have 15-20 minutes.

Have good evening,  
Todd McCally



[REDACTED]  
[REDACTED]  
[todd@](#)[REDACTED]

---

**From:** Ed Graham <[REDACTED]>  
**Date:** Tuesday, February 20, 2018 at 2:33 PM  
**To:** Todd McCally <[REDACTED]>  
**Subject:** RE: Discussion next week ...

Hi Todd, sorry no. I'm meeting with Rod unexpectedly but time with him is rare and precious. Again, **I apologize.** How would Thursday or Friday work?

**From:** Todd McCally [REDACTED]  
**Sent:** Tuesday, February 20, 2018 2:07 PM  
**To:** [egraham@\[REDACTED\]](mailto:egraham@[REDACTED])  
**Subject:** Re: Discussion next week ...

Hi Ed,

Is now still a good time?

Thanks,  
Todd McCally



[REDACTED]  
[REDACTED]  
[Todd@\[REDACTED\]](mailto:Todd@[REDACTED])

---

**From:** Ed Graham  
**Date:** Friday, February 16, 2018 at 3:30 PM  
**To:** Todd McCally  
**Subject:** RE: Discussion next week ...

Sounds good Todd. I will call you then.

---

**From:** Todd McCally [REDACTED]  
**Sent:** Friday, February 16, 2018 3:18 PM  
**To:** [egraham@\[REDACTED\]](mailto:egraham@[REDACTED])  
**Subject:** Re: Discussion next week ...

Ed,

I misspoke, let's do Tuesday at 2pm!

Thanks,  
Todd McCally



[REDACTED]  
[REDACTED]  
[Todd@\[REDACTED\]](mailto:Todd@[REDACTED])

---

**From:** Ed Graham  
**Date:** Friday, February 16, 2018 at 2:34 PM  
**To:** Todd McCally, Todd McCally

**Subject:** Discussion next week ...

Hi Todd,

Long time – hope you and your family are all well and business is prosperous.

Is it possible to chat for 10 or 15 minutes maybe after 2:00 on Tuesday or Wednesday afternoon or even after 5:00 if it's better for you? Here are the items I would like to talk about:

- Maybe having you oversee a new PPC for us – discuss the setup, our cost ...
- We are close on the two new websites – just an update as the SEO will be placed soon then.
- Hiring a SEO and Rep Management sales person in Dallas that could work for both of us. Would you entertain splitting this (cost and revenues) somehow? Deep water in Dallas is my thinking. If we want to float a battleship the water has to be deep and Iowa is a dingy hence the idea.

The team is kicking in our Tin Moon Optimization next week so that's exciting. Have a good weekend.

Thanks, Todd.

Ed



# **EXHIBIT 18**

## Search Engine Optimization by Sales & Marketers for Sales & Marketers

NO RISK. We guarantee page 1 listings or your money is refunded! No risk yet you still get the reward of more visibility for much less investment.

[Request Info](#) [Test Your Site](#)

Welcome to Tin Moon Labs! Read on to see how our SEO services can help you increase your website traffic and profits.

### Why Search Engine Optimization (SEO)?

- SEO leads have a 13.6% close rate, while outbound leads (such as direct mail or print advertising) have a 1.7% close rate.
- 93% of your prospects start their search online.
- 80% of users ignore paid ads and only focus on Organic results.
- Organic Searchers stay on your website 6 times as long than paid searchers.
- 94% of smart phone owners look for local information on their phones.
- SEO provides unlimited traffic at a fixed cost. Pay Per Click turns off when you exhaust your daily budget.
- Online Ad Blockers are flourishing but they do not affect SEO "Organic" listings.
- 92% of marketers rate Search Engine Optimization (SEO) as successful in achieving marketing objectives like lead generation and increased web traffic.
- Companies listed on Page 1 of a Google search receive the most sales inquiries.

[Learn More](#)

### Why Tin Moon SEO?

- Laser Focus.** Search Engine Optimization is our focus. We are true "SEO EXPERTS" rather than being a "jack of all trades" in the digital marketing world.
- No Risk / Guaranteed Results.** If we do not get you on Page 1 of multiple search engines we will refund your investment - period.
- Value Equation.** Unlimited traffic from Page 1 visibility for a fixed and published investment level. Simple, transparent and measurable profits.
- Performance Record.** Nearly 11,000 client's websites optimized over nearly 20 years without a single refund. We believe actions speak louder than words.
- Measurable Results.** If you use Pay per Click (PPC) Ads today then you can easily measure your savings. Remember, 80% of Search Engine users ignore paid ads.
- We are USA headquartered in the great state of Iowa where genuine, hard-working folks believe in having strong values. We may be a little old fashioned, but it's because we still think being able to talk to a real person any time you need us means a great deal.

[Learn More](#)

John Ferland on behalf of Digital Canal



## Contact Us

Toll-Free 1-844-471-7033

[info@tinmoonlabs.com](mailto:info@tinmoonlabs.com)

[Edit](#)

# **EXHIBIT 19**

34/834

527424 ART030 \$50.00 SELF 2 2007

**ARTICLES OF ORGANIZATION  
OF  
SALTO DE FEDE, LLC**

The undersigned Organizer of a limited liability company organized under the Iowa Limited Liability Company Act, Chapter 490A, Code of Iowa, does hereby adopt the following Articles of Organization for such limited liability company.

**ARTICLE I  
NAME OF THE LIMITED LIABILITY COMPANY**

The name of the limited liability company shall be Salto de Fede, LLC

**ARTICLE II  
REGISTERED OFFICE AND REGISTERED AGENT**

The address of the initial registered office of the limited liability company is 2728 Asbury Rd., Dubuque, IA 52001, initial registered agent at such address is Ed Graham.

**ARTICLE III  
PRINCIPAL OFFICE**

The address of the principal office of the limited liability company is 2728 Asbury Rd., Dubuque, IA 52001.

**ARTICLE IV  
PERIOD OF DURATION**

The limited liability company's existence shall be perpetual.

**ARTICLE V  
WRITTEN OPERATING AGREEMENT**

Any operating agreement entered into by the members of the limited liability company, and any amendments or restatements thereof, shall be in writing. No oral agreement among any of the members or managers of the limited liability company shall be deemed or construed to constitute any portion of, or otherwise affect the interpretation of, any writing operating agreement of the limited liability company, as amended and in existence from time to time.

**ARTICLE VI  
MANAGERS**

The business and affairs of the limited liability company shall be governed by managers. The actions of a member or any other person acting in any capacity other than as a manager of the limited liability company shall not bind the limited liability company.

2

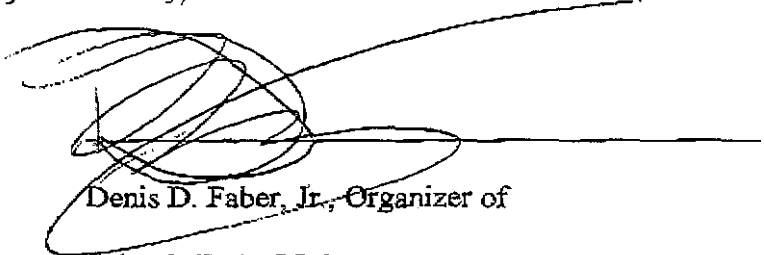
013772

**ARTICLE VII  
LIMITATION OF LIABILITY MANAGERS**

Managers of the limited liability company shall not be liable to the limited liability company or its members for monetary damages for breach of fiduciary duty as a manager, provided, however, that this limitation of liability does not apply to any of the following:

1. Breach of the manager's duty of loyalty to the limited liability company or its members.
2. Acts or omissions not in good faith or which involve intentional misconduct or a knowing violation of law.
3. Transaction from which the manager derives an improper personal benefit or a wrongful distribution in violation of Iowa Code Section 490A.807.

IN WITNESS WHEREOF, the aforesaid organizer has caused the execution of the foregoing Articles of Organization on this 21<sup>st</sup> day of February, 2007.

  
Denis D. Faber, Jr., Organizer of  
Salto de Fede, LLC

FILED  
IOWA  
SECRETARY OF STATE  
2/21/07  
2:30pm  
W518633



# **EXHIBIT 20**

~~SECRETARY OF STATE  
IOWA~~  
2010 JAN -4 PM 3:09

STATEMENT OF AUTHORITY

OF

SALTO DE FEDE, LLC

341834

STAU \$5.00 DJC 2 3/4/11 560570

TO THE SECRETARY OF STATE OF THE STATE OF IOWA:

The undersigned, acting as members of SALTO DE FEDE, LLC and pursuant to §302 of the *Revised Uniform Limited Liability Company Act*, Chapter 489 of the 2009 *Code of Iowa*, hereby files the a statement of authority for the limited liability company:

ARTICLE I

The name of the limited liability company is "**SALTO DE FEDE, LLC**". The Street address and mailing address for the limited liability company, is 2728 Asbury Road, Dubuque, Iowa 52001.

ARTICLE II

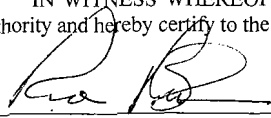
The address of the initial registered office of the limited liability company in the State of Iowa is 2728 Asbury Road, Dubuque, IA 52001, and the name of its initial registered agent at such address is Ed Graham.

ARTICLE III

Any two out of the following three members shall have authority to execute an instrument transferring real property held in the name of the limited liability company and shall have authority to enter into other transactions on behalf of the limited liability or otherwise act for or bind the limited liability company: Rod L. Blum and/or Ed Graham and/or Daniel C. Lansing.

2011 MAR -14 PM 10:22  
SECRETARY OF STATE  
IOWA

IN WITNESS WHEREOF, the undersigned members have executed this Statement of Authority and hereby certify to the same this 29<sup>th</sup> day of December, 2009.

  
\_\_\_\_\_  
ROD L. BLUM

  
\_\_\_\_\_  
ED GRAHAM

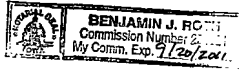
  
\_\_\_\_\_  
DANIEL C. LANSING

(2)

STATE OF IOWA, DUBUQUE COUNTY, ss:

On this 29<sup>th</sup> day of December, 2009, before me, the undersigned, a Notary Public in and for said state, personally appeared ROD L. BLUM, to me known to be the same person who signed the above instrument and acknowledged the same to be his voluntary act and deed.

Benjamin J. Roth  
Notary Public, State of Iowa



STATE OF IOWA, DUBUQUE COUNTY, ss:

On this 29<sup>th</sup> day of December, 2009, before me, the undersigned, a Notary Public in and for said state, personally appeared ED GRAHAM, to me known to be the same person who signed the above instrument and acknowledged the same to be his voluntary act and deed.

Benjamin J. Roth  
Notary Public, State of Iowa




STATE OF IOWA, DUBUQUE COUNTY, ss:

On this 30<sup>th</sup> day of December, 2009, before me, the undersigned, a Notary Public in and for said state, personally appeared DANIEL C. LANSING, to me known to be the same person who signed the above instrument and acknowledged the same to be his voluntary act and deed.

Benjamin J. Roth  
Notary Public, State of Iowa



FILED  
IOWA  
SECRETARY OF STATE  
3-4-2011  
10:22 AM  
W726984  




# **EXHIBIT 21**



## Summary

**Parcel ID** 1018428021  
**Alternate ID**  
**Property Address** 5436 PARK PL  
 ASBURY IA 52002  
**Sec/Twp/Rng** N/A  
**Brief Tax Description** LOT 1-29 BLOCK 2 MILL CREEK ESTATES;  
 (Note: Not to be used on legal documents)  
**Deed Book/Page** 2017-3222 (3/23/2017)  
**Contract Book/Page**  
**Gross Acres** 0.00  
**Net Acres** 0.00  
**Class** R - Residential  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**District** ASA2 - ASBURY CITY/DUBUQUE COMM SCH/ANNEXATION 2  
**School District** DUBUQUE COMM. SCHOOL DIST



## Owners

**Deed Holder**  
 Goepfner, Gregory H & Michele R  
 5436 Park Pl  
 Asbury IA 52002

### Contract Holder

**Mailing Address**  
 Goepfner, Gregory H & Michele R  
 5436 Park Pl  
 Asbury IA 52002

## Land

**Lot Dimensions** Regular Lot: 54.00 x 136.00  
**Lot Area** 0.17 Acres; 7,344 SF

## Residential Dwellings

**Residential Dwelling**  
**Occupancy** Single-Family / Owner Occupied  
**Style** 1 Story Frame  
**Architectural Style** Zero lot line-1s (1 wall)  
**Year Built** 2016  
**Condition** Normal  
**Grade what's this?** 3-10  
**Roof** Asph / Gable  
**Flooring** None  
**Foundation** Conc  
**Exterior Material** Vinyl  
**Interior Material** None  
**Brick or Stone Veneer** 1 Story Brick; 12 linear ft.  
 1 Story Stone; 4 linear ft.  
**Total Gross Living Area** 1,114 SF  
**Attic Type** None;  
**Number of Rooms** 4 above; 0 below  
**Number of Bedrooms** 2 above; 0 below  
**Basement Area Type** Full  
**Basement Area** 1,114  
**Basement Finished Area**  
**Plumbing** 1 Full Bath; 1 Shower Stall Bath;  
**Appliances** 1 Dishwasher; 1 Microwave;  
**Central Air** Yes  
**Heat** Yes  
**Fireplaces**  
**Porches** 1S Frame Open (64 SF);  
**Decks** Wood Deck-Med (120 SF);  
**Additions**  
**Garages** 447 SF - Att Frame (Built 2016) - Plot GAR;

## Sales

Date	Seller	Buyer	Recording	Sale Condition - NUTC	Type	Multi Parcel	Amount
3/22/2017	ROUTLEY CONSTRUCTION LLC	GOEPPNER, GREGORY H AND MICHELE R	17-3222	Normal	Deed		\$170,000.00
9/14/2015	SALTO DE FEDE, LLC	ROUTLEY CONSTRUCTION, LLC	15-12043	Lot assessed as unplatted land (5 year plat rule)	Deed		\$45,500.00

+ There are other parcels involved in one or more of the above sales:

Includes sales on or after 1/1/2003

**Valuation**

	2018	2017	2016	2015
Classification	Residential	Residential	Residential	Residential
+ Assessed Land Value	\$22,670	\$22,670	\$21,385	\$2,191
+ Assessed Building Value	\$0	\$0	\$0	\$0
+ Assessed Dwelling Value	\$138,070	\$138,070	\$65,110	\$0
<b>= Gross Assessed Value</b>	<b>\$160,740</b>	<b>\$160,740</b>	<b>\$86,495</b>	<b>\$2,191</b>
- Exempt Value	\$0	\$0	\$0	\$0
<b>= Net Assessed Value</b>	<b>\$160,740</b>	<b>\$160,740</b>	<b>\$86,495</b>	<b>\$2,191</b>

**Taxation**

	2016 Pay 2017-2018	2015 Pay 2016-2017
+ Taxable Land Value	\$12,177	\$1,219
+ Taxable Building Value	\$0	\$0
+ Taxable Dwelling Value	\$37,073	\$0
<b>= Gross Taxable Value</b>	<b>\$49,250</b>	<b>\$1,219</b>
- Military Credit	\$0	\$0
<b>= Net Taxable Value</b>	<b>\$49,250</b>	<b>\$1,219</b>
x Levy Rate (per \$1000 of value)	Multiple Levy Rates	Multiple Levy Rates
<b>= Gross Taxes Due</b>	<b>\$1,586.47</b>	<b>\$38.81</b>
- Ag Land Credit	\$0.00	\$0.00
- Family Farm Credit	\$0.00	\$0.00
- Homestead Credit	\$0.00	\$0.00
- Disabled and Senior Citizens Credit	\$0.00	\$0.00
- Business Property Credit	\$0.00	\$0.00
<b>= Net Taxes Due</b>	<b>\$1,586.00</b>	<b>\$38.00</b>

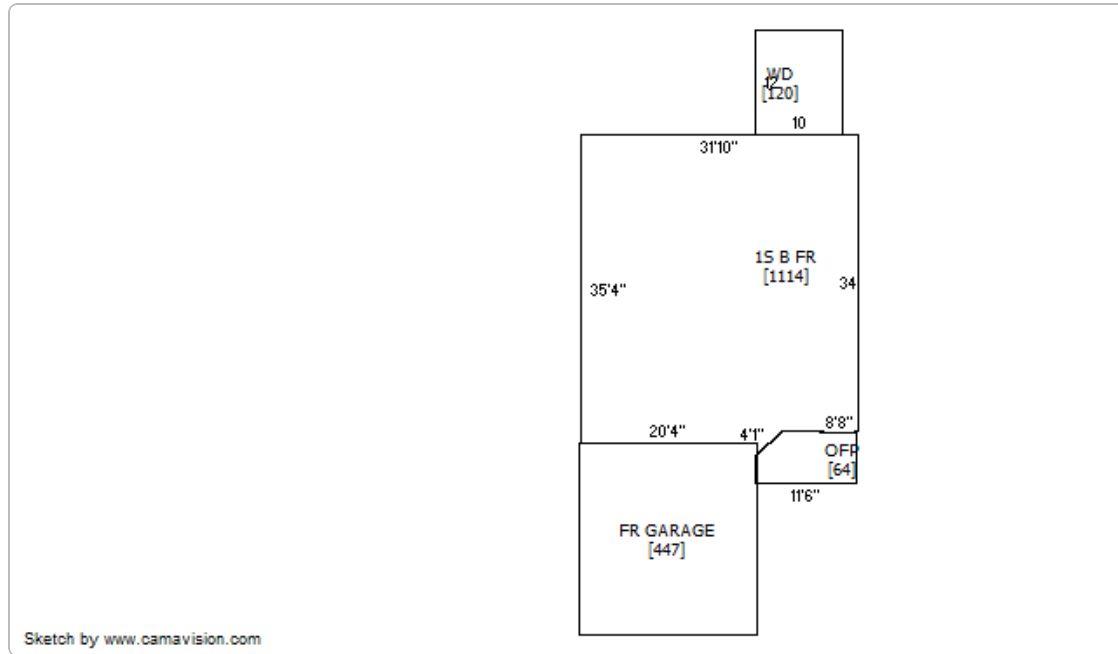
**Tax History**

Year	Due Date	Amount	Paid	Date Paid	Receipt
2016	March 2018	\$708	Yes	4/30/2018	451158
	September 2017	\$708	Yes	8/17/2017	
2016	March 2018	\$85	Yes	4/30/2018	451157
	September 2017	\$85	Yes	8/17/2017	
2015	March 2017	\$2	Yes	5/4/2017	355279
	September 2016	\$2	Yes	11/30/2016	
2015	March 2017	\$17	Yes	5/4/2017	355280
	September 2016	\$17	Yes	11/30/2016	

**Photos****Show Deed/Contract**

[Show Deed/Contract](#)

**Sketches**



No data available for the following modules: Commercial Buildings, Agricultural Buildings, Yard Extras, County Treasurer Notes, Tax Sale Certificates.

The information in this web site represents current data from a working file which is updated regularly. Information is believed reliable, but its accuracy cannot be guaranteed. No warranty, expressed or implied, is provided for the data herein or its use.

Developed by

Last Data Upload: 6/1/2018, 6:42:02 PM


**Beacon™** Dubuque County, IA
**Summary**

**Parcel ID** 1018428022  
**Alternate ID**  
**Property Address** 5440 PARK PL  
 ASBURY IA 52002  
**Sec/Twp/Rng** N/A  
**Brief Tax Description** LOT 2-29 BLOCK 2 MILL CREEK ESTATES;  
 (Note: Not to be used on legal documents)  
**Deed Book/Page** 2016-6984 (6/8/2016)  
**Contract Book/Page**  
**Gross Acres** 0.00  
**Net Acres** 0.00  
**Class** R - Residential  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**District** ASA2 - ASBURY CITY/DUBUQUE COMM SCH/ANNEXATION 2  
**School District** DUBUQUE COMM. SCHOOL DIST

**Owners**

**Deed Holder**  
 Schaefer, Candace  
 5440 Park Pl  
 Dubuque IA 52002

**Contract Holder**

**Mailing Address**  
 Schaefer, Candace  
 5440 Park Pl  
 Dubuque IA 52002

**Land**

**Lot Dimensions** Regular Lot: 54.00 x 136.00  
**Lot Area** 0.17 Acres; 7,344 SF

**Residential Dwellings**

**Residential Dwelling**  
**Occupancy** Single-Family / Owner Occupied  
**Style** 1 Story Frame  
**Architectural Style** Zero lot line-1s (1 wall)  
**Year Built** 2016  
**Condition** Normal  
**Grade what's this?** 3-10  
**Roof** Asph / Gable  
**Flooring** None  
**Foundation** Conc  
**Exterior Material** Vinyl  
**Interior Material** None  
**Brick or Stone Veneer** 1 Story Brick; 12 linear ft.  
 1 Story Stone; 4 linear ft.  
**Total Gross Living Area** 1,114 SF  
**Attic Type** None;  
**Number of Rooms** 4 above; 0 below  
**Number of Bedrooms** 2 above; 0 below  
**Basement Area Type** Full  
**Basement Area** 1,114  
**Basement Finished Area**  
**Plumbing** 1 Full Bath; 1 Shower Stall Bath;  
**Appliances** 1 Dishwasher; 1 Microwave;  
**Central Air** Yes  
**Heat** Yes  
**Fireplaces**  
**Porches** 1S Frame Open (64 SF);  
**Decks** Wood Deck-Med (120 SF);  
**Additions**  
**Garages** 447 SF - Att Frame (Built 2016) - Plot GAR;

**Sales**

Date	Seller	Buyer	Recording	Sale Condition - NUTC	Type	Multi Parcel	Amount
6/1/2016	ROUTLEY CONSTRUCTION, LLC	SCHAEFER, CANDACE	16-6984	Normal	Deed		\$186,574.00
9/14/2015	SALTO DE FEDE, LLC	ROUTLEY CONSTRUCTION, LLC	15-12043	Lot assessed as unplatted land (5 year plat rule)	Deed		\$45,500.00

+ There are other parcels involved in one or more of the above sales:

Includes sales on or after 1/1/2003

**Valuation**

	2018	2017	2016	2015
Classification	Residential	Residential	Residential	Residential
+ Assessed Land Value	\$22,670	\$22,670	\$21,385	\$2,189
+ Assessed Building Value	\$0	\$0	\$0	\$0
+ Assessed Dwelling Value	\$138,070	\$138,070	\$65,110	\$0
<b>= Gross Assessed Value</b>	<b>\$160,740</b>	<b>\$160,740</b>	<b>\$86,495</b>	<b>\$2,189</b>
- Exempt Value	\$0	\$0	\$0	\$0
<b>= Net Assessed Value</b>	<b>\$160,740</b>	<b>\$160,740</b>	<b>\$86,495</b>	<b>\$2,189</b>

**Taxation**

	2016 Pay 2017-2018	2015 Pay 2016-2017
+ Taxable Land Value	\$12,177	\$1,217
+ Taxable Building Value	\$0	\$0
+ Taxable Dwelling Value	\$37,073	\$0
<b>= Gross Taxable Value</b>	<b>\$49,250</b>	<b>\$1,217</b>
- Military Credit	\$0	\$0
<b>= Net Taxable Value</b>	<b>\$49,250</b>	<b>\$1,217</b>
x Levy Rate (per \$1000 of value)	Multiple Levy Rates	Multiple Levy Rates
<b>= Gross Taxes Due</b>	<b>\$1,586.47</b>	<b>\$38.76</b>
- Ag Land Credit	\$0.00	\$0.00
- Family Farm Credit	\$0.00	\$0.00
- Homestead Credit	(\$164.05)	\$0.00
- Disabled and Senior Citizens Credit	\$0.00	\$0.00
- Business Property Credit	\$0.00	\$0.00
<b>= Net Taxes Due</b>	<b>\$1,422.00</b>	<b>\$38.00</b>

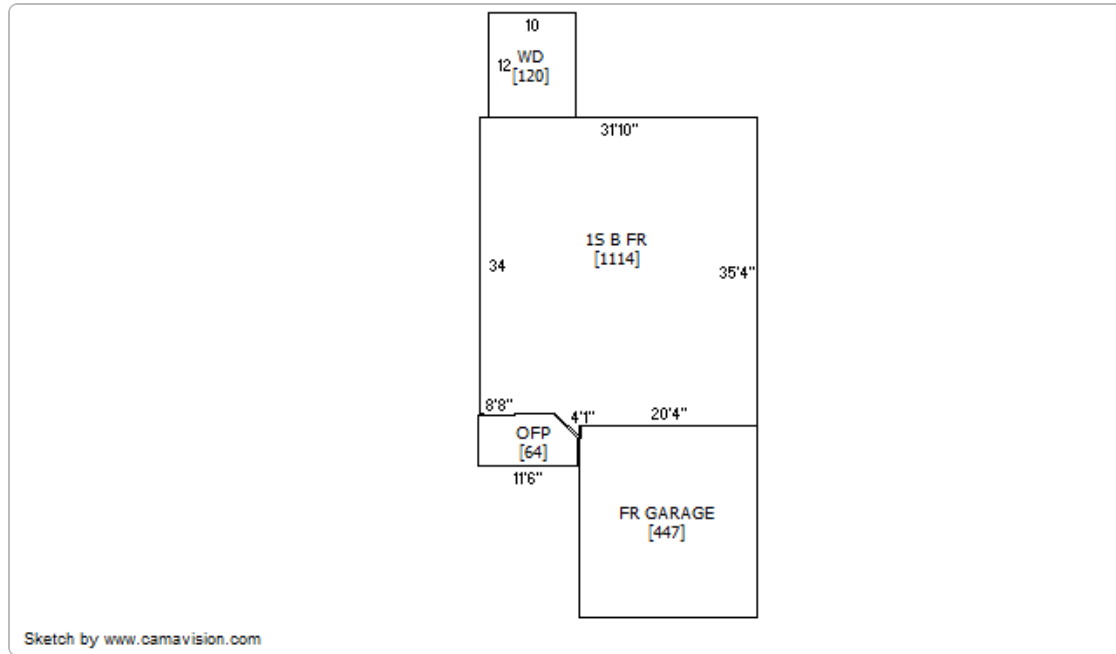
**Tax History**

Year	Due Date	Amount	Paid	Date Paid	Receipt
2016	March 2018	\$85	Yes	3/6/2018	451159
	September 2017	\$85	Yes	9/12/2017	
2016	March 2018	\$626	Yes	3/6/2018	451160
	September 2017	\$626	Yes	9/12/2017	
2015	March 2017	\$17	Yes	3/13/2017	355282
	September 2016	\$17	Yes	9/9/2016	
2015	March 2017	\$2	Yes	3/13/2017	355281
	September 2016	\$2	Yes	9/9/2016	

**Photos****Show Deed/Contract**

[Show Deed/Contract](#)

**Sketches**



No data available for the following modules: Commercial Buildings, Agricultural Buildings, Yard Extras, County Treasurer Notes, Tax Sale Certificates.

The information in this web site represents current data from a working file which is updated regularly. Information is believed reliable, but its accuracy cannot be guaranteed. No warranty, expressed or implied, is provided for the data herein or its use.

Developed by

Last Data Upload: 6/1/2018, 6:42:02 PM

# **EXHIBIT 22**





## Summary

**Parcel ID** 1018429044  
**Alternate ID**  
**Property Address** 5481 PARK PL  
 ASBURY IA 52002  
**Sec/Twp/Rng** N/A  
**Brief Tax Description** LOT 1-43 BLOCK 3 MILL CREEK ESTATES;  
 (Note: Not to be used on legal documents)  
**Deed Book/Page** 2015-14787 (11/18/2015)  
**Contract Book/Page**  
**Gross Acres** 0.00  
**Net Acres** 0.00  
**Class** R - Residential  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**District** ASA2 - ASBURY CITY/DUBUQUE COMM SCH/ANNEXATION 2  
**School District** DUBUQUE COMM. SCHOOL DIST



## Owners

**Deed Holder**  
 Wilming, Kelsey R  
 5481 Park Pl  
 Dubuque IA 52002

### Contract Holder

**Mailing Address**  
 Wilming, Kelsey R  
 5481 Park Pl  
 Dubuque IA 52002

## Land

Lot Dimensions	Regular Lot: x				
Front Footage		Front	Rear	Side 1	Side 2
Main Lot		60.00	97.00	116.00	140.00
Sub Lot 2		0.00	0.00	0.00	0.00
Sub Lot 3		0.00	0.00	0.00	0.00
Sub Lot 4		0.00	0.00	0.00	0.00

**Lot Area** 0.23 Acres; 10,048 SF

## Residential Dwellings

**Residential Dwelling**  
**Occupancy** Single-Family / Owner Occupied  
**Style** 1 Story Frame  
**Architectural Style** Zero lot line-1s (1 wall)  
**Year Built** 2015  
**Condition** Normal  
**Grade what's this?** 3-10  
**Roof** Asph / Gable  
**Flooring** Carpet/Laminate  
**Foundation** Conc  
**Exterior Material** Vinyl  
**Interior Material** Drwl  
**Brick or Stone Veneer** 1 Story Brick; 14 linear ft.  
**Total Gross Living Area** 1,114 SF  
**Attic Type** None;  
**Number of Rooms** 4 above; 0 below  
**Number of Bedrooms** 2 above; 0 below  
**Basement Area Type** Full  
**Basement Area** 1,114  
**Basement Finished Area**  
**Plumbing** 2 Full Bath;  
**Appliances** 1 Dishwasher; 1 Microwave;  
**Central Air** Yes  
**Heat** Yes  
**Fireplaces**  
**Porches** 1S Frame Open (64 SF);  
**Decks** Wood Deck-Med (144 SF);  
**Additions**  
**Garages** 447 SF - Att Frame (Built 2015) - Plot GAR;

**Sales**

Date	Seller	Buyer	Recording	Sale Condition - NUTC	Type	Multi Parcel	Amount
11/16/2015	ROUTLEY CONSTRUCTION LLC	WILMING, KELSEY R	15-14787	Normal	Deed		\$170,000.00
6/22/2015	SALTO DE FEDE LLC	ROUTLEY CONSTRUCTION, LLC	15-8136	Lot assessed as unplatted land (5 year plat rule)	Deed		\$46,000.00

+ There are other parcels involved in one or more of the above sales:

Includes sales on or after 1/1/2003

**Valuation**

	2018	2017	2016	2015
Classification	Residential	Residential	Residential	Residential
+ Assessed Land Value	\$29,750	\$29,750	\$28,070	\$2,464
+ Assessed Building Value	\$0	\$0	\$0	\$0
+ Assessed Dwelling Value	\$136,700	\$136,700	\$129,270	\$0
= <b>Gross Assessed Value</b>	<b>\$166,450</b>	<b>\$166,450</b>	<b>\$157,340</b>	<b>\$2,464</b>
- Exempt Value	\$0	\$0	\$0	\$0
= <b>Net Assessed Value</b>	<b>\$166,450</b>	<b>\$166,450</b>	<b>\$157,340</b>	<b>\$2,464</b>

**Taxation**

	2016 Pay 2017-2018	2015 Pay 2016-2017
+ Taxable Land Value	\$15,983	\$1,371
+ Taxable Building Value	\$0	\$0
+ Taxable Dwelling Value	\$73,605	\$0
= <b>Gross Taxable Value</b>	<b>\$89,588</b>	<b>\$1,371</b>
- Military Credit	\$0	\$0
= <b>Net Taxable Value</b>	<b>\$89,588</b>	<b>\$1,371</b>
x Levy Rate (per \$1000 of value)	Multiple Levy Rates	Multiple Levy Rates
= <b>Gross Taxes Due</b>	<b>\$2,885.85</b>	<b>\$43.65</b>
- Ag Land Credit	\$0.00	\$0.00
- Family Farm Credit	\$0.00	\$0.00
- Homestead Credit	(\$164.05)	\$0.00
- Disabled and Senior Citizens Credit	\$0.00	\$0.00
- Business Property Credit	\$0.00	\$0.00
= <b>Net Taxes Due</b>	<b>\$2,722.00</b>	<b>\$42.00</b>

**Tax History**

Year	Due Date	Amount	Paid	Date Paid	Receipt
2016	March 2018	\$155	Yes	3/5/2018	450043
	September 2017	\$155	Yes	9/7/2017	
2016	March 2018	\$1,206	Yes	3/5/2018	450044
	September 2017	\$1,206	Yes	9/6/2017	
2015	March 2017	\$2	Yes	2/17/2017	355442
	September 2016	\$2	Yes	9/21/2016	
2015	March 2017	\$19	Yes	2/17/2017	355443
	September 2016	\$19	Yes	9/21/2016	

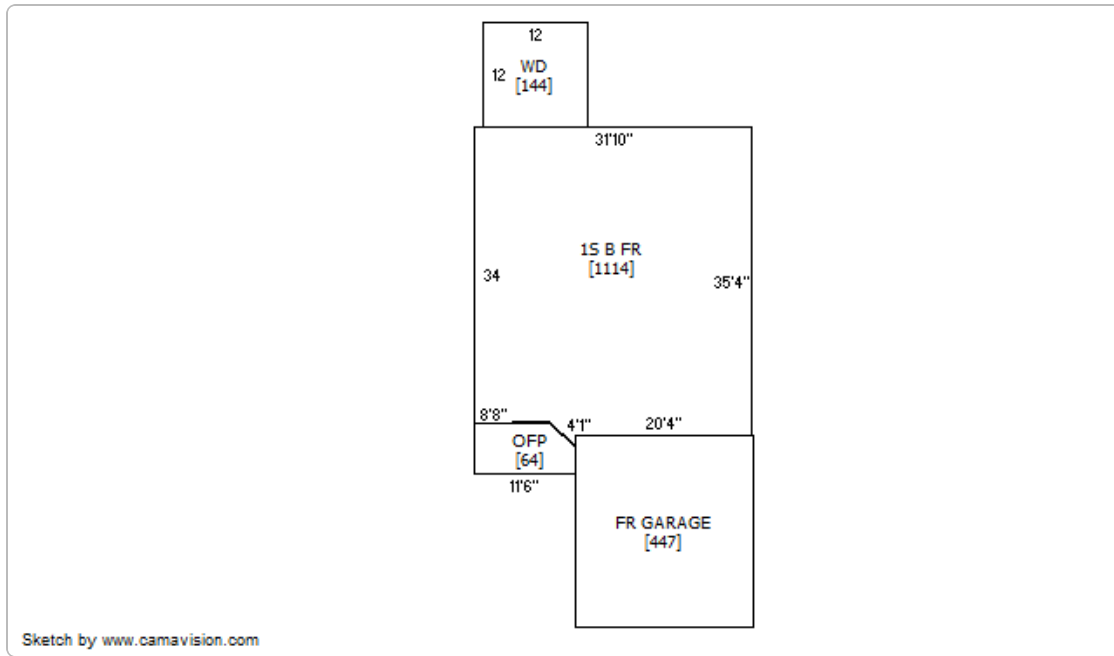
**Photos**



Show Deed/Contract

[Show Deed/Contract](#)

Sketches



No data available for the following modules: Commercial Buildings, Agricultural Buildings, Yard Extras, County Treasurer Notes, Tax Sale Certificates.

The information in this web site represents current data from a working file which is updated regularly. Information is believed reliable, but its accuracy cannot be guaranteed. No warranty, expressed or implied, is provided for the data herein or its use.

Developed by

Last Data Upload: 6/1/2018, 6:42:02 PM



## Summary

**Parcel ID** 1018429045  
**Alternate ID**  
**Property Address** 5485 PARK PL  
 ASBURY IA 52002  
**Sec/Twp/Rng** N/A  
**Brief Tax Description** LOT 2-43 BLOCK 3 MILL CREEK ESTATES;  
 (Note: Not to be used on legal documents)  
**Deed Book/Page** 2015-14789 (11/18/2015)  
**Contract Book/Page**  
**Gross Acres** 0.00  
**Net Acres** 0.00  
**Class** R - Residential  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**District** ASA2 - ASBURY CITY/DUBUQUE COMM SCH/ANNEXATION 2  
**School District** DUBUQUE COMM. SCHOOL DIST



## Owners

**Deed Holder**  
 Wilming, Zachary  
 5485 Park Pl  
 Dubuque IA 52002

### Contract Holder

**Mailing Address**  
 Wilming, Zachary  
 5485 Park Pl  
 Dubuque IA 52002

## Land

**Lot Dimensions** Regular Lot: x

Front Footage	Front	Rear	Side 1	Side 2
Main Lot	60.00	60.00	140.00	125.00
Sub Lot 2	0.00	0.00	0.00	0.00
Sub Lot 3	0.00	0.00	0.00	0.00
Sub Lot 4	0.00	0.00	0.00	0.00

**Lot Area** 0.18 Acres; 7,950 SF

## Residential Dwellings

**Residential Dwelling**  
**Occupancy** Single-Family / Owner Occupied  
**Style** 1 Story Frame  
**Architectural Style** Zero lot line-1s (1 wall)  
**Year Built** 2015  
**Condition** Normal  
**Grade what's this?** 3-10  
**Roof** Asph / Gable  
**Flooring** Carpet/Laminate  
**Foundation** Conc  
**Exterior Material** Vinyl  
**Interior Material** Drwl  
**Brick or Stone Veneer** 1 Story Brick; 14 linear ft.  
**Total Gross Living Area** 1,114 SF  
**Attic Type** None;  
**Number of Rooms** 4 above; 0 below  
**Number of Bedrooms** 2 above; 0 below  
**Basement Area Type** Full  
**Basement Area** 1,114  
**Basement Finished Area**  
**Plumbing** 2 Full Bath;  
**Appliances** 1 Dishwasher; 1 Microwave;  
**Central Air** Yes  
**Heat** Yes  
**Fireplaces**  
**Porches** 1S Frame Open (64 SF);  
**Decks** Wood Deck-Med (144 SF);  
**Additions**  
**Garages** 447 SF - Att Frame (Built 2015) - Plot GAR;

**Sales**

Date	Seller	Buyer	Recording	Sale Condition - NUTC	Type	Multi Parcel	Amount
11/16/2015	ROUTLEY CONSTRUCTION LLC	WILMING, ZACHARY	15-14789	Normal	Deed		\$171,900.00
6/22/2015	SALTO DE FEDE LLC	ROUTLEY CONSTRUCTION, LLC	15-8136	Lot assessed as unplatted land (5 year plat rule)	Deed		\$46,000.00

+ There are other parcels involved in one or more of the above sales:

Includes sales on or after 1/1/2003

**Valuation**

	2018	2017	2016	2015
Classification	Residential	Residential	Residential	Residential
+ Assessed Land Value	\$25,190	\$25,190	\$23,760	\$2,086
+ Assessed Building Value	\$0	\$0	\$0	\$0
+ Assessed Dwelling Value	\$136,700	\$136,700	\$129,270	\$0
= <b>Gross Assessed Value</b>	<b>\$161,890</b>	<b>\$161,890</b>	<b>\$153,030</b>	<b>\$2,086</b>
- Exempt Value	\$0	\$0	\$0	\$0
= <b>Net Assessed Value</b>	<b>\$161,890</b>	<b>\$161,890</b>	<b>\$153,030</b>	<b>\$2,086</b>

**Taxation**

	2016 Pay 2017-2018	2015 Pay 2016-2017
+ Taxable Land Value	\$13,528	\$1,160
+ Taxable Building Value	\$0	\$0
+ Taxable Dwelling Value	\$73,605	\$0
= <b>Gross Taxable Value</b>	<b>\$87,133</b>	<b>\$1,160</b>
- Military Credit	\$0	\$0
= <b>Net Taxable Value</b>	<b>\$87,133</b>	<b>\$1,160</b>
x Levy Rate (per \$1000 of value)	Multiple Levy Rates	Multiple Levy Rates
= <b>Gross Taxes Due</b>	<b>\$2,806.78</b>	<b>\$36.94</b>
- Ag Land Credit	\$0.00	\$0.00
- Family Farm Credit	\$0.00	\$0.00
- Homestead Credit	(\$164.05)	\$0.00
- Disabled and Senior Citizens Credit	\$0.00	\$0.00
- Business Property Credit	\$0.00	\$0.00
= <b>Net Taxes Due</b>	<b>\$2,644.00</b>	<b>\$36.00</b>

**County Treasurer Notes**

\$5096.52 PRELIMINARY SPECIAL ASSESSMENT HALES MILL ROAD PCC PAVEMENT

**Tax History**

Year	Due Date	Amount	Paid	Date Paid	Receipt
2016	March 2018	\$1,171	Yes	3/14/2018	450046
	September 2017	\$1,171	Yes	9/28/2017	
2016	March 2018	\$151	Yes	3/14/2018	450045
	September 2017	\$151	Yes	9/28/2017	
2015	March 2017	\$16	Yes	8/15/2016	355445
	September 2016	\$16	Yes	8/15/2016	
2015	March 2017	\$2	Yes	8/15/2016	355444
	September 2016	\$2	Yes	8/15/2016	

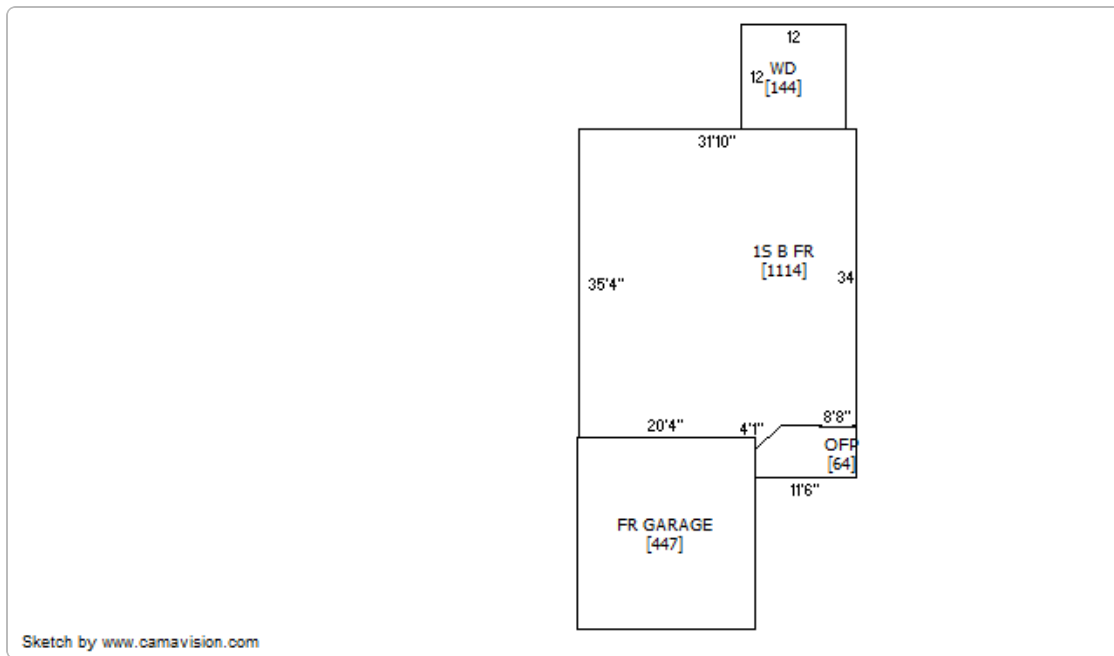
**Photos**



**Show Deed/Contract**

[Show Deed/Contract](#)

**Sketches**



No data available for the following modules: Commercial Buildings, Agricultural Buildings, Yard Extras, Tax Sale Certificates.

The information in this web site represents current data from a working file which is updated regularly. Information is believed reliable, but its accuracy cannot be guaranteed. No warranty, expressed or implied, is provided for the data herein or its use.

Developed by

Last Data Upload: 6/1/2018, 6:42:02 PM

# **EXHIBIT 23**



## Summary

**Parcel ID** 1018428019  
**Alternate ID**  
**Property Address** 5460 PARK PL  
 ASBURY IA 52002  
**Sec/Twp/Rng** N/A  
**Brief Tax Description** LOT 1-32 BLOCK 2 MILL CREEK ESTATES;  
 (Note: Not to be used on legal documents)  
**Deed Book/Page** 2015-9111 (8/26/2015)  
**Contract Book/Page**  
**Gross Acres** 0.00  
**Net Acres** 0.00  
**Class** R - Residential  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**District** ASA2 - ASBURY CITY/DUBUQUE COMM SCH/ANNEXATION 2  
**School District** DUBUQUE COMM. SCHOOL DIST



## Owners

**Deed Holder**  
 Magedanz, Thomas C & Julieta L  
 5460 Park Pl  
 Dubuque IA 52002

### Contract Holder

**Mailing Address**  
 Magedanz, Thomas C & Julieta L  
 5460 Park Pl  
 Dubuque IA 52002

## Land

**Lot Dimensions** Regular Lot: 54.00 x 136.00  
**Lot Area** 0.17 Acres; 7,344 SF

## Residential Dwellings

**Residential Dwelling**  
**Occupancy** Single-Family / Owner Occupied  
**Style** 1 Story Frame  
**Architectural Style** Zero lot line-1s (1 wall)  
**Year Built** 2016  
**Condition** Normal  
**Grade what's this?** 3-10  
**Roof** Asph / Gable  
**Flooring** Carpet/Laminate  
**Foundation** Conc  
**Exterior Material** Vinyl  
**Interior Material** Drwl  
**Brick or Stone Veneer** 1 Story Brick; 14 linear ft.  
**Total Gross Living Area** 1,114 SF  
**Attic Type** None;  
**Number of Rooms** 5 above; 2 below  
**Number of Bedrooms** 3 above; 1 below  
**Basement Area Type** Full  
**Basement Area** 1,114  
**Basement Finished Area** 492 - Living Qtrs. (Multi)  
**Plumbing** 2 Full Bath; 1 Shower Stall Bath;  
**Appliances** 1 Dishwasher; 1 Microwave;  
**Central Air** Yes  
**Heat** Yes  
**Fireplaces**  
**Porches** 1S Frame Open (64 SF);  
**Decks** Wood Deck-Med (144 SF);  
**Additions**  
**Garages** 447 SF - Att Frame (Built 2016) - Plot GAR;

## Sales

Date	Seller	Buyer	Recording	Sale Condition - NUTC	Type	Multi Parcel	Amount
7/13/2015	ROUTLEY CONSTRUCTION LLC	MAGEDANZ, THOMAS AND JULIETA	15-9111	Normal	Deed		\$186,616.00
2/23/2015	SALTO DE FEDE LLC	ROUTLEY CONSTRUCTION, LLC	15-2344	Lot assessed as unplatted land (5 year plat rule)	Deed		\$47,000.00

+ There are other parcels involved in one or more of the above sales:

Includes sales on or after 1/1/2003



**Valuation**

	2018	2017	2016	2015
Classification	Residential	Residential	Residential	Residential
+ Assessed Land Value	\$22,670	\$22,670	\$21,380	\$2,189
+ Assessed Building Value	\$0	\$0	\$0	\$0
+ Assessed Dwelling Value	\$152,480	\$152,480	\$138,840	\$0
<b>= Gross Assessed Value</b>	<b>\$175,150</b>	<b>\$175,150</b>	<b>\$160,220</b>	<b>\$2,189</b>
- Exempt Value	\$0	\$0	\$0	\$0
<b>= Net Assessed Value</b>	<b>\$175,150</b>	<b>\$175,150</b>	<b>\$160,220</b>	<b>\$2,189</b>

**Taxation**

	2016 Pay 2017-2018	2015 Pay 2016-2017
+ Taxable Land Value	\$12,174	\$1,217
+ Taxable Building Value	\$0	\$0
+ Taxable Dwelling Value	\$79,054	\$0
<b>= Gross Taxable Value</b>	<b>\$91,228</b>	<b>\$1,217</b>
- Military Credit	\$0	\$0
<b>= Net Taxable Value</b>	<b>\$91,228</b>	<b>\$1,217</b>
x Levy Rate (per \$1000 of value)	Multiple Levy Rates	Multiple Levy Rates
<b>= Gross Taxes Due</b>	<b>\$2,938.69</b>	<b>\$38.76</b>
- Ag Land Credit	\$0.00	\$0.00
- Family Farm Credit	\$0.00	\$0.00
- Homestead Credit	\$0.00	\$0.00
- Disabled and Senior Citizens Credit	\$0.00	\$0.00
- Business Property Credit	\$0.00	\$0.00
<b>= Net Taxes Due</b>	<b>\$2,938.00</b>	<b>\$38.00</b>

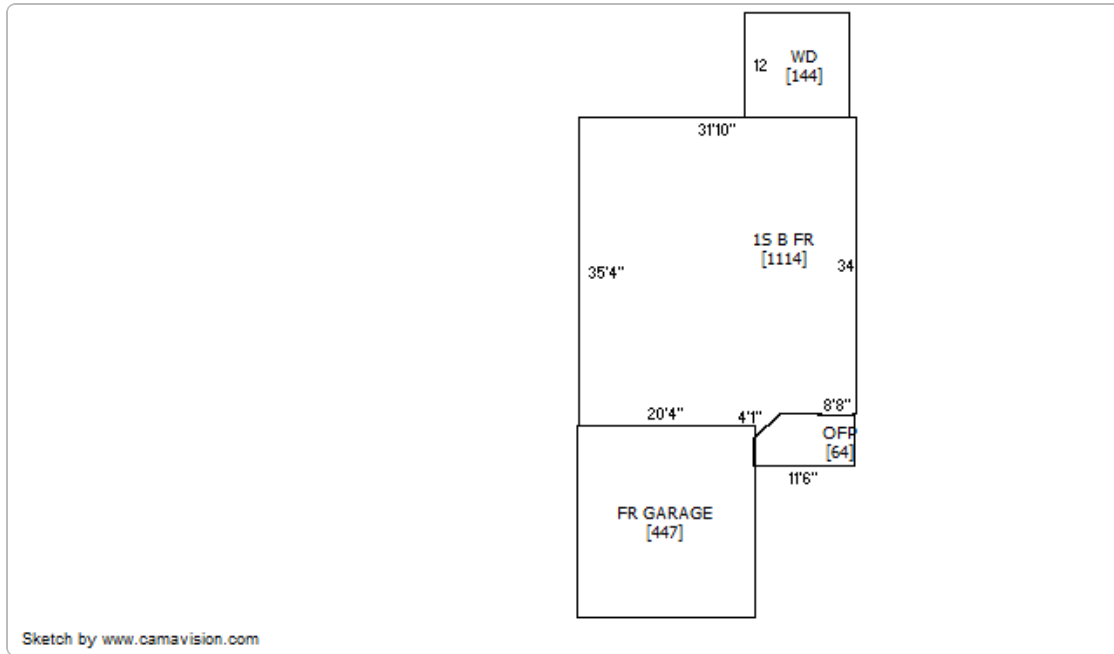
**Tax History**

Year	Due Date	Amount	Paid	Date Paid	Receipt
2016	March 2018	\$1,311	Yes	3/22/2018	450757
	September 2017	\$1,311	Yes	9/25/2017	
2016	March 2018	\$158	Yes	3/22/2018	450756
	September 2017	\$158	Yes	9/25/2017	
2015	March 2017	\$2	Yes	3/27/2017	354775
	September 2016	\$2	Yes	10/3/2016	
2015	March 2017	\$17	Yes	3/29/2017	354776
	September 2016	\$17	Yes	9/23/2016	
2014	March 2016	\$4	Yes	3/31/2016	303352
	September 2015	\$4	Yes	9/23/2015	
2014	March 2016	\$14	Yes	3/21/2016	303351
	September 2015	\$14	Yes	9/23/2015	

**Photos****Show Deed/Contract**

[Show Deed/Contract](#)

**Sketches**



No data available for the following modules: Commercial Buildings, Agricultural Buildings, Yard Extras, County Treasurer Notes, Tax Sale Certificates.

The information in this web site represents current data from a working file which is updated regularly. Information is believed reliable, but its accuracy cannot be guaranteed. No warranty, expressed or implied, is provided for the data herein or its use.

Developed by

Last Data Upload: 6/1/2018, 6:42:02 PM


**Beacon™** Dubuque County, IA

### Summary

**Parcel ID** 1018428020  
**Alternate ID**  
**Property Address** 5464 PARK PL  
 ASBURY IA 52002  
**Sec/Twp/Rng** N/A  
**Brief Tax Description** LOT 2-32 BLOCK 2 MILL CREEK ESTATES;  
 (Note: Not to be used on legal documents)  
**Deed Book/Page** 2018-5204 (5/15/2018)  
**Contract Book/Page**  
**Gross Acres** 0.00  
**Net Acres** 0.00  
**Class** R - Residential  
 (Note: This is for tax purposes only. Not to be used for zoning.)  
**District** ASA2 - ASBURY CITY/DUBUQUE COMM SCH/ANNEXATION 2  
**School District** DUBUQUE COMM. SCHOOL DIST



### Owners

**Deed Holder**  
 Miller, William R & Ann E  
 5464 Park Pl  
 Asbury IA 52002

### Contract Holder

**Mailing Address**  
 Miller, William R & Ann E  
 5464 Park Pl  
 Asbury IA 52002

### Land

**Lot Dimensions** Regular Lot: 54.00 x 136.00  
**Lot Area** 0.17 Acres; 7,344 SF

### Residential Dwellings

**Residential Dwelling**  
**Occupancy** Single-Family / Owner Occupied  
**Style** 1 Story Frame  
**Architectural Style** Zero lot line-1s (1 wall)  
**Year Built** 2016  
**Condition** Normal  
**Grade what's this?** 3-10  
**Roof** Asph / Gable  
**Flooring** Carpet/Laminate  
**Foundation** Conc  
**Exterior Material** Vinyl  
**Interior Material** Drwl  
**Brick or Stone Veneer** 1 Story Brick; 14 linear ft.  
**Total Gross Living Area** 1,114 SF  
**Attic Type** None;  
**Number of Rooms** 5 above; 0 below  
**Number of Bedrooms** 3 above; 0 below  
**Basement Area Type** Full  
**Basement Area** 1,114  
**Basement Finished Area**  
**Plumbing** 2 Full Bath;  
**Appliances** 1 Dishwasher; 1 Microwave;  
**Central Air** Yes  
**Heat** Yes  
**Fireplaces**  
**Porches** 1S Frame Open (64 SF);  
**Decks** Wood Deck-Med (144 SF);  
**Additions**  
**Garages** 447 SF - Att Frame (Built 2016) - Plot GAR;

### Sales

Date	Seller	Buyer	Recording	Sale Condition - NUTC	Type	Multi Parcel	Amount
5/3/2018	DAVIS, JAMIE L	MILLER, WILLIAM R AND ANN E	18-5204	Normal	Deed		\$210,000.00
7/13/2015	ROUTLEY CONSTRUCTION LLC	DAVIS, JAMIE L	15-10467	Normal	Deed		\$175,800.00
2/23/2015	SALTO DE FEDE LLC	ROUTLEY CONSTRUCTION, LLC	15-2344	Lot assessed as unplatted land (5 year plat rule)	Deed		\$47,000.00

+ There are other parcels involved in one or more of the above sales:

Includes sales on or after 1/1/2003

18-2049\_0163

**Valuation**

	2018	2017	2016	2015
Classification	Residential	Residential	Residential	Residential
+ Assessed Land Value	\$22,670	\$22,670	\$21,380	\$2,189
+ Assessed Building Value	\$0	\$0	\$0	\$0
+ Assessed Dwelling Value	\$138,100	\$138,100	\$129,270	\$0
<b>= Gross Assessed Value</b>	<b>\$160,770</b>	<b>\$160,770</b>	<b>\$150,650</b>	<b>\$2,189</b>
- Exempt Value	\$0	\$0	\$0	\$0
<b>= Net Assessed Value</b>	<b>\$160,770</b>	<b>\$160,770</b>	<b>\$150,650</b>	<b>\$2,189</b>

**Taxation**

	2016 Pay 2017-2018	2015 Pay 2016-2017
+ Taxable Land Value	\$12,174	\$1,217
+ Taxable Building Value	\$0	\$0
+ Taxable Dwelling Value	\$73,605	\$0
<b>= Gross Taxable Value</b>	<b>\$85,779</b>	<b>\$1,217</b>
- Military Credit	\$0	\$0
<b>= Net Taxable Value</b>	<b>\$85,779</b>	<b>\$1,217</b>
x Levy Rate (per \$1000 of value)	Multiple Levy Rates	Multiple Levy Rates
<b>= Gross Taxes Due</b>	<b>\$2,763.16</b>	<b>\$38.76</b>
- Ag Land Credit	\$0.00	\$0.00
- Family Farm Credit	\$0.00	\$0.00
- Homestead Credit	(\$164.05)	\$0.00
- Disabled and Senior Citizens Credit	\$0.00	\$0.00
- Business Property Credit	\$0.00	\$0.00
<b>= Net Taxes Due</b>	<b>\$2,598.00</b>	<b>\$38.00</b>

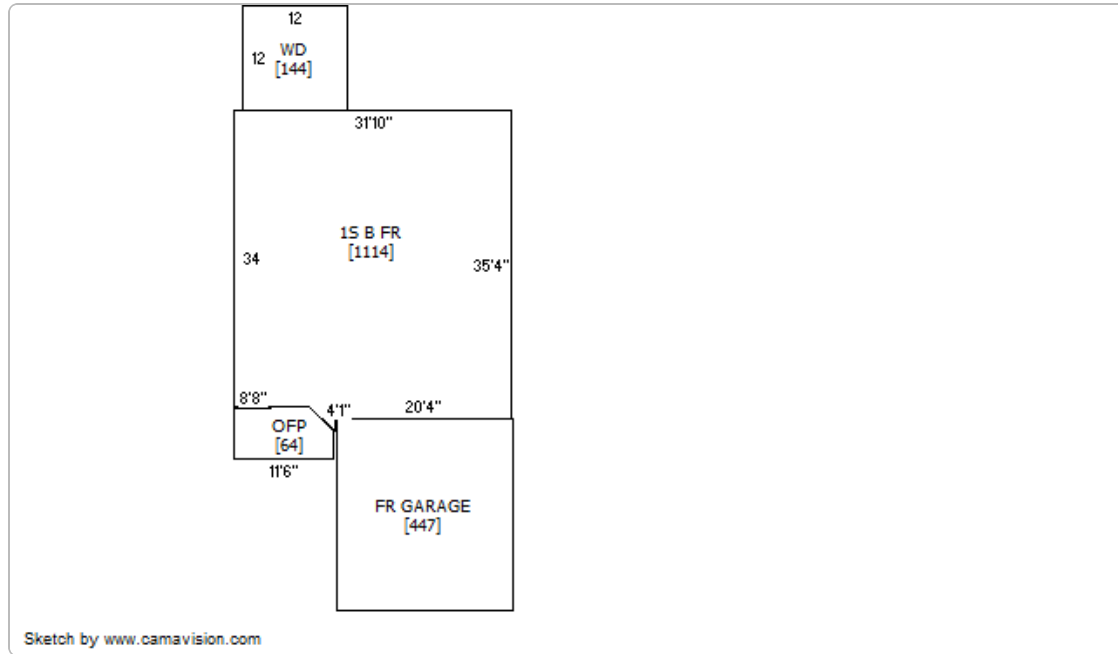
**Tax History**

Year	Due Date	Amount	Paid	Date Paid	Receipt
2016	March 2018	\$1,151	Yes	3/29/2018	450760
	September 2017	\$1,151	Yes	8/25/2017	
2016	March 2018	\$148	Yes	3/29/2018	450759
	September 2017	\$148	Yes	8/25/2017	
2015	March 2017	\$2	Yes	8/11/2016	354777
	September 2016	\$2	Yes	8/11/2016	
2015	March 2017	\$17	Yes	8/11/2016	354778
	September 2016	\$17	Yes	8/11/2016	
2014	March 2016	\$14	Yes	9/8/2015	303353
	September 2015	\$14	Yes	9/8/2015	
2014	March 2016	\$4	Yes	9/8/2015	303354
	September 2015	\$4	Yes	9/8/2015	

**Photos****Show Deed/Contract**

[Show Deed/Contract](#)

**Sketches**



No data available for the following modules: Commercial Buildings, Agricultural Buildings, Yard Extras, County Treasurer Notes, Tax Sale Certificates.

The information in this web site represents current data from a working file which is updated regularly. Information is believed reliable, but its accuracy cannot be guaranteed. No warranty, expressed or implied, is provided for the data herein or its use.

Developed by

Last Data Upload: 6/1/2018, 6:42:02 PM

# **EXHIBIT 24**

## SEARCH ENGINE OPTIMIZATION BY SALES & MARKETERS FOR SALES & MARKETERS

NO RISK. we guarantee Page 1 listings or your money is refunded. No risk yet you still get the reward of increased visibility.

FREE SITE TEST CONTACT US

http://tinmoonlabs.com

Go NOV FEB MAR  
◀ 07 ▶  
2017 2018 2019



8 captures  
29 Jul 2017 - 22 Feb 2018

About this capture

### Why Search Engine Optimization(SEO)?

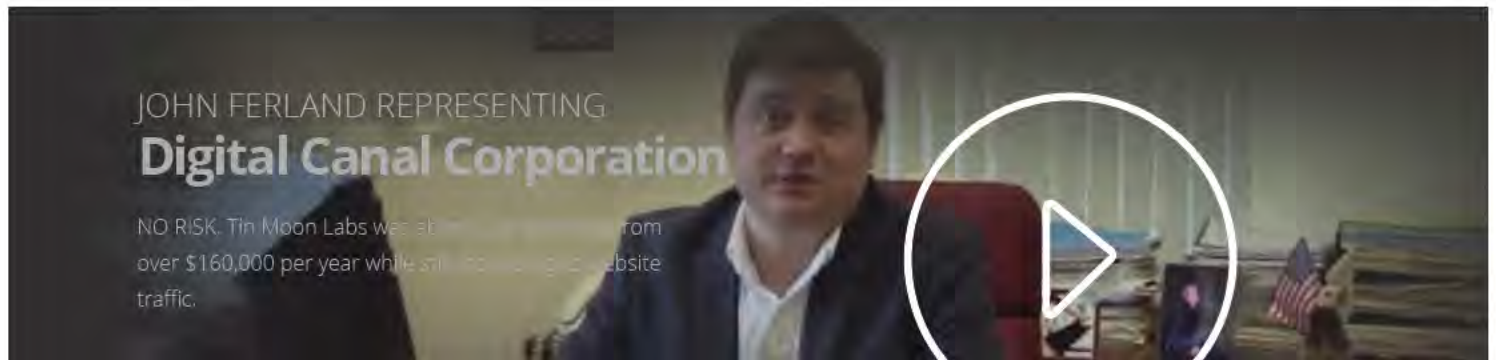
Welcome to Tin Moon Labs! Read on to see how our SEO services will help you increase your Website Traffic and Profits.

Read More...

### Why Tin Moon SEO

LASER FOCUS. Search Engine Optimization is our focus. We are true "SEO EXPERTS" rather than being a "jack of all trades" in the digital world

Read More...



## 11,000 Website Clients Can't Be Wrong



page placement in the search engines and I landed a \$90,000.00 sale. That same client spent over \$500K with us the first year!"

**Jeff C.**

"Our Pay Per Click campaign spend was nearly \$200,000 which made the switch to Tin Moon worth it by itself. But, our traffic has increased at the same time. "

**Kristen W.**

contact us page as we cannot physically answer all of the phone calls from inquiries."

**Gib H.**

"It's been less than 30 days since you optimized my site and my traffic from Google is up 358%!"

**Robert S.**

[READ MORE](#)

# Tin Moon Corporation SEO Marketing Des Moines IA

To request a Proposal or to answer any questions please call [844-471-7033](tel:844-471-7033). Or click here [info@tinmoonlabs.com](mailto:info@tinmoonlabs.com) to send an email and we will contact you.

Welcome to Tin Moon SEO Services, a time trusted Dubuque digital marketing company that takes a strategic and comprehensive approach to getting your business noticed online by potential clients.

It doesn't take a rocket scientist to know what the typical consumer does when they are on the hunt for a product or services. Unless they have a word-of-mouth referral from a friend or family member, they typically go searching online.

In fact, data shows that 93 percent of potential clients begin their quest for desired products and services online – and, with our extensive Dubuque digital marketing services, your website can be waiting for them when they do.

## Dubuque SEO services that provide an organic avenue of marketing

When it comes to gaining visibility online, there are two general mindsets. You can buy space online through paid ads. All of the major search engines offer pay-per-click ad spaces that you can purchase so that potential clients will almost always come across your listing (but, they might not necessarily click). Or the paid may have already turned off for the day.

Then, on the other side of the coin, there is the Organic approach, where you ensure that internet searchers will find your website and stay engaged thus giving you the opportunity for the sale over your competition! As a trusted Dubuque SEO provider, we take the latter approach – strategic approach – because you receive unlimited visibility for a fixed investment. This equation is a very appealing return on your investment.

## Proven, ethical SEO methods that work for you

Our Dubuque digital marketing company will utilize white hat methods to get your website listed on Page 1 of the search engine results pages. For instance, if you're a lawn care company in the Dubuque area, wouldn't you want your website listed on Page 1 of Google, Bing and/or Yahoo when a prospect searches "Landscaping company in Dubuque IA"? Page 1 is where most clicks (sales leads) happen? If you are there and your competition is not then you get the lead and your competition does not!

With our Dubuque digital marketing services, this can be a reality. Potential clients that are searching for your products or services will be strategically driven to your page, where we will also help with necessary content to convert that visitor into a customer.

## Search engine optimization is one of the most effective forms of digital marketing

The organic nature of SEO is what makes it such an effective form of marketing. Consider some of the following drawbacks of paying for your space online:

- Once your specified budget is up daily, they won't list your site anymore
- A wide majority of searchers completely ignore the paid ads section
- Organic searchers prove to be more engaged with your site's content
- With paid ads, you have to worry about ad blockers and similar software
- And more, click here: <http://tinmoonlabs.com/why-seo/>

Don't force anyone to find your website — let them find it organically on Page 1 so they know that you are not paying for an ad, you earned the Page 1 position!

Our Dubuque digital marketing company will work diligently and strategically to gain you organic visibility online and we guarantee results.

To request a Proposal or to answer any questions please call [844-471-7033](tel:844-471-7033). Or click here [info@tinmoonlabs.com](mailto:info@tinmoonlabs.com) to send an email and we will contact you.



Get all the information

## About Us

Tin Moon Corporation was founded with the idea that we can help businesses grow by using our own proven marketing experience and expertise to increase your business. We became our own Case Study by implementing the time tested and unique SEO Strategies that we will use to help you, in another business with the same ownership as Tin Moon Corporation.

The result was that we reduced our cost while simultaneously increasing our traffic. This is exactly the business equation every company is hoping to experience. Given this success we decided to bring our expertise to you so we can increase your traffic and save you money. In today's digital world you have many choices. But, very few provide guaranteed results by having used these unique Strategies **themselves**.

## Test Your Site

## Success Stories

## Sitemap

### Contact info

844 471 7033

info@TinMoonLabs.com

Tin Moon Corporation  
2728 Asbury Road  
Dubuque, IA 52001

Copyright, TinMoonLabs.com, All Rights Reserved

Website by The Stevens Company

# **EXHIBIT 25**

Read More...

Read More...

Read More...

## JOHN FERLAND REPRESENTING **Digital Canal Corporation**

NO RISK. Tin Moon Labs was able to cut spending from over \$160,000 per year while still increasing its website traffic.

**GET STARTED**



## **11,000 Website Clients Can't Be Wrong**

What Our Customers Say

"Great work. In three weeks we went from NO placement to front page placement in the search engines and I landed a \$90,000.00 sale. That same client spent over \$500K with us the first year!"

**Jeff C.**

"Our Pay Per Click campaign spend was nearly \$200,000 which made the switch to Tin Moon worth it by itself. But, our traffic has increased at the same time."

**Kristen W.**

"Please remove our phone number from our home page and our contact us page as we cannot physically answer all of the phone calls from inquiries."

**Gib H.**

"It's been less than 30 days since you optimized my site and my traffic from Google is up 358%!"

**Robert S.**

18-2049\_0171

# **EXHIBIT 26**



## Why Search Engine Optimization(SEO)?

Welcome to Tin Moon Labs! Read on to see how our SEO services will help you increase your Website Traffic and Profits.

[Read More...](#)

## Why Reputation Management?

When you search your company's name do you see negative information? If you do, this is hurting your business and costing you sales.

[Read More...](#)

## Why Tin Moon?

Search Engine Optimization and Reputation Management are our sole focus. We are true "EXPERTS" rather than being a "jack of all trades" in the digital world.

[Read More...](#)



## 11,000 Website Clients Can't Be Wrong

What Our Customers Say

"Great work. In three weeks we went from NO placement to front page placement in the search engines and I landed a \$90,000.00 sale. That same client spent over \$500K with us the first year!"

**Jeff C.**

"Our Pay Per Click campaign spend was nearly \$200,000 which made the switch to Tin Moon worth it by itself. But, our traffic has increased at the same time. "

**Kristen W.**

"Please remove our phone number from our home page and our contact us page as we cannot physically answer all of the phone calls from inquiries."

**Gib H.**

"It's been less than 30 days since you optimized my site and my traffic from Google is up 358%!"

**Robert S.**

[READ MORE](#)

# **EXHIBIT 27**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

**Transcript of Tin Moon Video**  
**“John Ferland Representing Digital Canal Corporation”**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 John Ferland: We're a small company, especially small relative to our competition. Our top  
2 competitors were on page one of Google and Bing when prospects were  
3 searching for our products. It was obvious that we needed to compete with the  
4 sales leads that our competition was getting. We thought that pay per click ad  
5 campaigns with Google and Bing were our only option for trying to keep up with  
6 our competitors, even though our products are much better. We heard about Tin  
7 Moon Labs and their guarantee to get us on page one of the search engines. Since  
8 we had nothing to lose with Tin Moon's money back guarantee, we tried it. And  
9 now we're on page one with our competition, and getting the same visibility they  
10 are. Tin Moon is now saving us thousands of dollars every month, keeping our  
11 traffic and leads higher than the pay per click ads were producing. Tin Moon has  
12 enabled our company to reduce our marketing investment while actually gaining  
13 more traffic and sales leads. From one business owner to another, I suggest you  
14 take a look at Tin Moon.



# **EXHIBIT 28**



rodblum  
2 subscribers

SUBSCRIBE 2

HOME

Uploads PLAY ALL



Tin Moon SEO  
317 views • 1 year ago



DistrictConventionforTransfer  
15 views • 6 years ago



Rod Blum addresses District Covention  
82 views • 6 years ago



Rod Blum Why I'm Running for Congress  
131 views • 6 years ago

Created playlists



Favorites

Liked videos



10 songs to play on mandolin that aren't bluegrass

mandohat • 945K views • 3 years ago

I love bluegrass, but the mandolin is a great instrument for lots of styles! <http://www.andyslessons.com>  
—Andy Hatfield, mandolin and guitarist

# **EXHIBIT 29**



### Tin Moon SEO

310 views

LIKE DISLIKE SHARE



**rodblum**

Published on Aug 29, 2016



Contact Tin Moon Labs today to see how we can help take you to page 1 GUAR

SHOW MORE

# **EXHIBIT 30**

**Transcript of “rodblum” YouTube Channel Video  
“Tin Moon SEO”  
Uploaded August 29, 2016**

CONFIDENTIAL

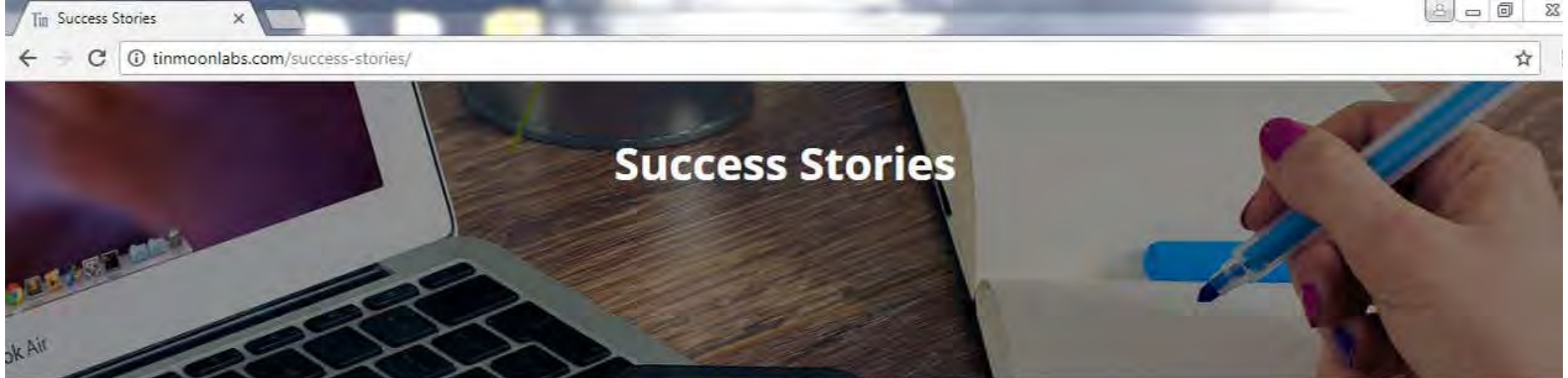
---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

1 Kristin W.: We are a small company, especially small relative to our competition. Our top  
2 competitors were on page one on Google and Bing when prospects were  
3 searching for our products. It was obvious we needed to compete for the sales  
4 leads that our competition was getting. We thought that pay per click ad  
5 campaigns from Google and Bing were our only option in trying to keep up with  
6 our competitors, even though our products are better. We heard about Tin Moon  
7 Labs and their guarantee to get us on page one of the search engines. Since we  
8 had nothing to lose with Tin Moon's money back guarantee, we tried it. And now  
9 we are on page one with our competition, and getting the same visibility they are.  
10 Tin Moon is now saving us thousands of dollars every month, to keeping our  
11 traffic and leads higher than the pay per click ads were producing. Tin Moon has  
12 enabled our company to reduce our marketing investment while actually gaining  
13 more traffic and sales leads. They monitor internet performance more closely  
14 than we do to make sure we stay on page one.

# **EXHIBIT 31**

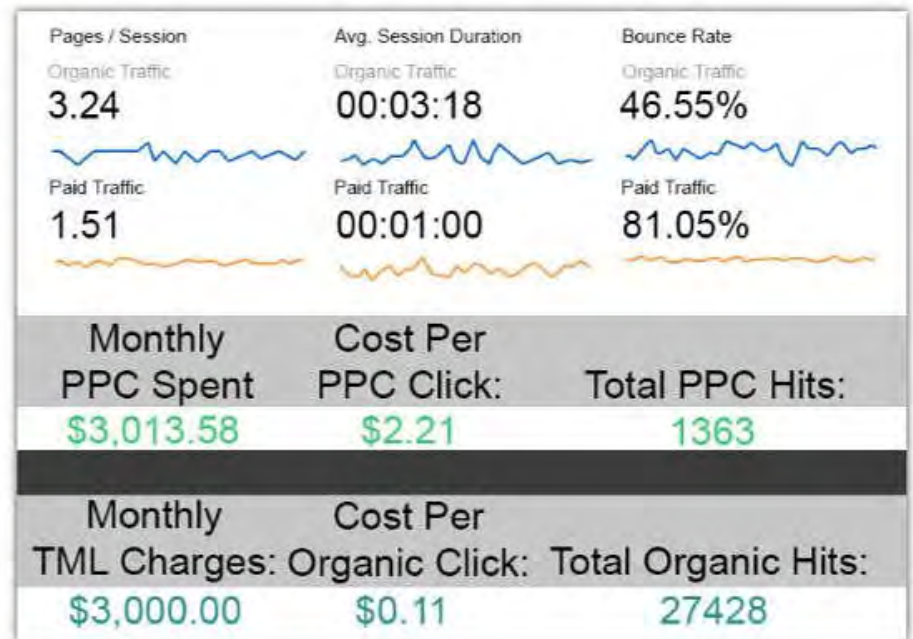




# Success Stories

- "We tracked 277 new sales in '06 from our internet search engine exposure!"*  
**Janie M.**
- "Three weeks after I hired you, we went from NO placement to front page placement in the search engines and I landed a \$90,000.00 sale. That same client spent over \$500,000 with us the first year!"*  
**Jeff C.**
- "Our Pay Per Click campaign spend was nearly \$200,000 which made the switch to Tin Moon worth it by itself. But, our traffic has increased at the same time.*  
**Kristen W.**
- "Please remove our phone number from our home page and our contact us page as we cannot physically answer all of the phone calls from inquiries."*  
**Gib H.**
- "It's been less than 30 days since you optimized my site and my traffic from Google is up 358%."*  
**Robert S**

Below is once client's example of PPC (pay per click) vs. SEO (ORGANIC Search) – cost and results. This client's revenue increased from approximately \$20,000 a month to peaking at over \$200,000 a month.



# **EXHIBIT 32**



## Success Stories

*"We tracked 277 new sales in '06 from our internet search engine exposure!" **Janie M.***

*"Three weeks after I hired you, we went from NO placement to front page placement in the search engines and I landed a \$90,000.00 sale. That same client spent over \$500,000 with us the first year!" **Jeff C.***

*"Our investment went from nearly \$200,000 in pay per click (PPC) to \$0.00 which made the move to Web Edge worth it by itself. But, our traffic has increased at the same time. **Kristen W.***

*"Please remove our phone number from our home page and our contact us page as we cannot physically answer all of the phone calls from inquiries." **Gib H.***

*We optimized a site in the self-storage industry with a Level 10 optimization plan. This business was able to track 277 new clients that signed up on the new pages we added to the site. According to our client, each new client they obtained had an annualized value of \$1,200.00. They received \$322,400.00 in annualized revenue for an advertising cost of \$22,000.00.*

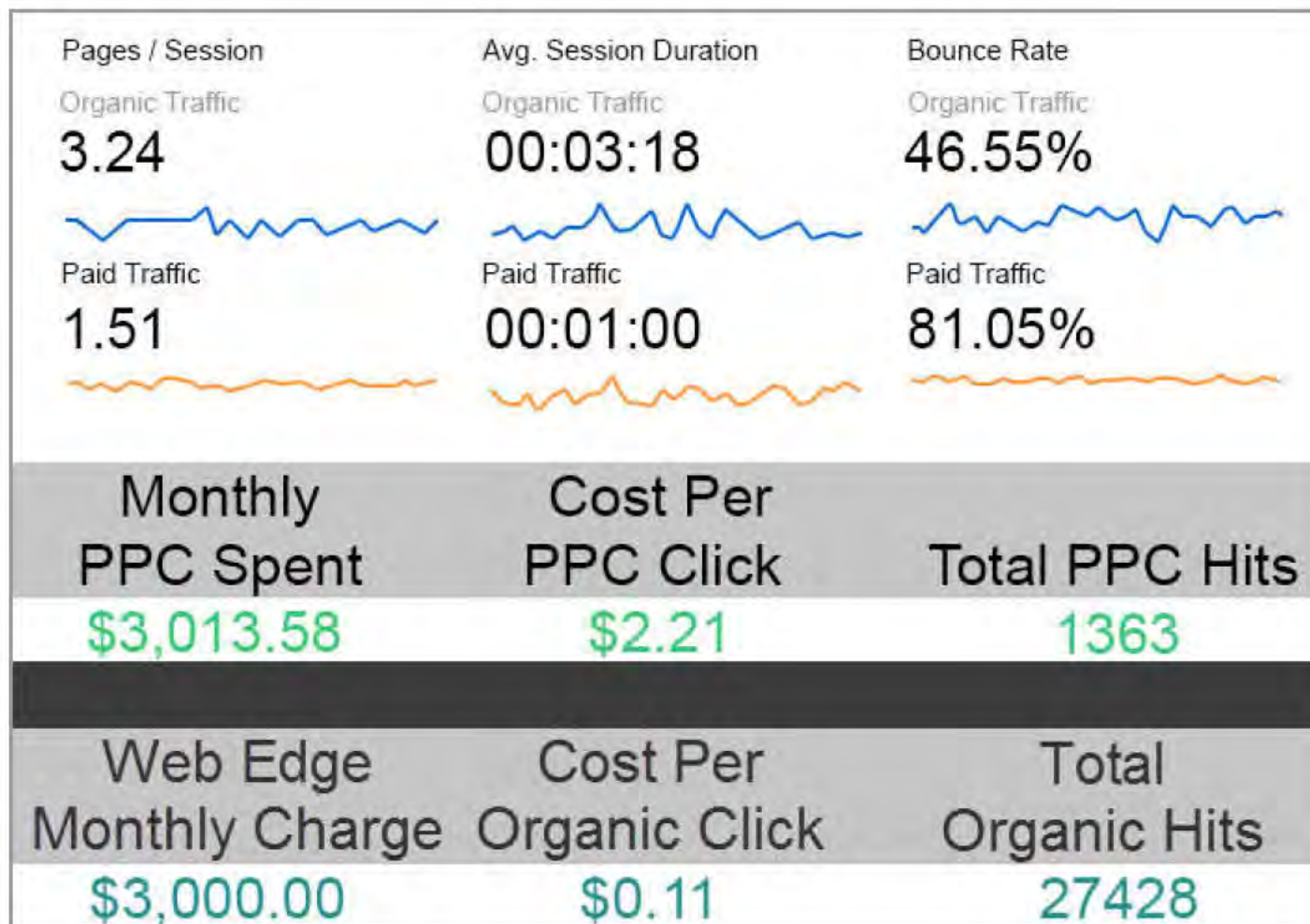
*An executive recruiter was about to sign an annual agreement to start a pay per click (PPC) advertising campaign on Google. We were able to provide them with a Level 3 service plan instead of the PPC plan they were contemplating. Four days after uploading the optimization, our client received a phone call after being found on the front page of Yahoo for a keyword phrase we had optimized them for. They closed the sale over the phone and our client received a \$90,000.00 check the next day to place two executive positions. This same client upgraded twice and has now sold his business for "mid seven figures". He called us and thanked us, "If it weren't for you guys, none of this would have been possible; you've changed my life!"*

*We performed a Level 5 optimization for a mortgage company's recruiting branch offices to expand their reach into 14 states. Approximately 30 days after launching the optimization, the recruiting director contacted us and begged us to remove the*



phone number from the recruiting site we optimized as well as the contact us page. They simply couldn't handle all of the inquiries via telephone and had to manage them via email only. We helped them grow from 50 branches to over 450 branches in just over three years.

Below is one client's example of PPC (pay per click) vs. SEO (ORGANIC Search) – cost and results. This client's revenue increased from approximately \$20,000 a month to peaking at over \$200,000 a month.



What you're looking at in the top half of the above graphic are three columns of data from Google Analytics. The first column reveals that organic visitors view twice as many pages when they visit the site over paid advertising visitors. The second column reveals that organic visitors stay on the site over three times longer per visit. The last column shows the bounce rate; over eight

*out of ten paid visitors bounce off the site while less than half of the organic visitors bounce off. Organic visitors show a 35% reduction in bounce rate versus paid visitors! It's obvious that organic visitors are a better class of visitor.*

*In the bottom half of the above graphic are three columns comparing the cost per click of PPC vs cost per Organic Listings and the total number of hits/clicks per method. It's plain to see that Web Edge Organic Listings give you a much greater return on investment than PPC.*

*"It's been less than 30 days since you optimized my site and my traffic from Google is up 358%." **Robert S***

## Recent Posts

[How Valuable Is The First Page of Google?](#)

[Lower Your PPC Expense While Increasing Traffic To Your Website](#)

[How to Get on the First Page of Google](#)

[What Is SEO Anyway?](#)

## Recent Comments

[SEO Tricks For Tour Operators | Vacation Labs on How Valuable Is The First Page of Google?](#)

[Get on Google's First Page | Web Edge Digital Marketing on What Is SEO Anyway?](#)

## Archives

[July 2017](#)

[May 2017](#)

[April 2017](#)

[March 2017](#)

## Categories

[Uncategorized](#)

## Meta

[Log in](#)

[Entries RSS](#)

[Comments RSS](#)

[WordPress.org](#)

[Home](#)

[About Us](#)

[Test Your Site](#)

[Services](#)

[Blog](#)

[Contact Us](#)

## Sitemap

# **EXHIBIT 33**

https://digitalcanal.com/

Go

JAN FEB APR

21

2016 2018 2019



321 captures

18 Jan 2002 - 24 May 2018

About this capture



MENU




[CLICK HERE](#) for Current Promotion



## Professional Estimating & Design Software

For a Personal Demonstration, Free Trial or Pricing (monthly or one-time investment) please call **800-449-5033**. Or click here [info@digitalcanal.com](mailto:info@digitalcanal.com) to send an email and we will contact you.



JAN FEB APR
◀ 21 ▶
2016 2018 2019


321 captures  
 18 Jan 2002 - 24 May 2018

passionate about and skilled in — which is designing and building.

The Digital Canal team is comprised of fellow building professionals. We know that a huge chunk of your time — whether you're a builder, architect, remodeler or someone of a similar profession — is spent creating estimates and proposals for your projects.

This is a necessary evil of the job — you can't exactly skip it. But, with our contractor estimating software for builders, you can streamline this process and ensure accuracy at the same time. This enables you to automatically create airtight professional plans and professional proposals for your clients that will reinforce their trust and faith in you.

### **BidBuilder — innovative contractor estimating software for remodelers**

If you want to win more jobs, you have to start submitting more bids. With Digital Canal and our contractor estimating software called BidBuilder, you can do exactly that. The following is a little bit of information about this cutting-edge and award winning technology.

- First of all, it takes very little time to master this contractor estimating software for builders. In fact, on average it is only a two-hour learning curve before you start doing takeoffs and professional estimates with BidBuilder.
- BidBuilder is pre-loaded with thousands of items and assemblies to make your job faster and easier! This makes the takeoff and estimating functions and processes quick and efficient and easily modifiable if the client wants to change anything. It also provides organized reports such as Change Orders so you make money with changes and by selling more profitable upgrades.
- With the True Build technology backbone of BidBuilder you will know exactly where you made money, where you didn't make money and bid versus actual results on your project. This means that you will quickly understand where to add margins and where you can beat the competition. The more you know the numbers the better off you will be. The BidBuilder estimating software helps you avoid costly mistakes during the process and provide tight bids with the profit you expected. You will win more bids!
- The information you compile in BidBuilder can be seamlessly exported into a pre-loaded proposal template and it's also compliant with QuickBooks. This lets you submit bid after bid. If you win one additional job, the software has already paid for itself a few times over.

BidBuilder's accompanying Digital Takeoff software is another great award winning software tool that we provide. This allows users to run a takeoff quicker than ever before with a few clicks of the mouse. You can upload your project plans in a variety of file forms and start clicking the mouse to perform the takeoff, it is literally that simple.

This highly accurate and efficient software ensures that you avoid over – or under -ordering and delivering supplies while giving you freedom from mounds of paper and Excel spread sheets with outdated numbers, pricing and corrupted cells. Digital Canal's Digital Takeoff and BidBuilder estimating software will provide you with a one project Return on the Investment, that is impressive.

### **Explore our software — watch a free demonstration video**

We are confident that, once you experience BidBuilder and Digital Takeoff yourself, you will want it in your arsenal of time saving and profit making tools.

For a Personal Demonstration, Free Trial or Pricing (monthly or one-time investment) please call **800-449-5033**. Or click here [info@digitalcanal.com](mailto:info@digitalcanal.com) to send an email and we will contact you.

https://digitalcanal.com/

Go

JAN FEB APR



21

2016 2018 2019

About this capture

321 captures

18 Jan 2002 - 24 May 2018

ESTIMATING SOFTWARE

DESIGN SOFTWARE

MYBUILD WEB SERVICES

Home Company

Solutions Contact

Services

© 2018 Digital Canal. All Rights Reserved. | Sitemap