

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SECURITIES AND EXCHANGE COMMISSION,)
)
Plaintiff,)
) Case No. 4:12-cv-00080-CEJ
v.)
)
BURTON DOUGLAS MORRISS, et al.,)
)
Defendants)

**DECLARATION OF HANY TEYLOUNI
IN FURTHER SUPPORT OF CLAIM NO. 20**

1. I am a former employee of Acartha Group, LLC (“Acartha”) and was a non-executive employee of Acartha Technology Partners, LLC (“ATP”), two of the entities in receivership herein.

2. I submit this Declaration in support of my claim (Claim No. 20), which is comprised of deferred salary from August 1, 2008 to April 15, 2010.

3. While employed by Acartha and ATP, my primary roles were to oversee and manage ATP’s internal technology infrastructure (e.g., ensuring that ATP’s telephone and email systems were functioning), and conduct due diligence on the technological aspects of companies in which Acartha Group, LLC (“Acartha”) or one of its subsidiary entities was considering investing. I had no knowledge of the fraud alleged in the SEC Complaint against Doug Morriss and had almost no involvement with potential investors. When I resigned as an employee of ATP in 2010, I understood that ATP was obligated to pay my deferred salary.

4. In support of my claim, I submitted a copy of my employment agreement with Acartha, a copy of my 2008 and 2009 W-2 forms, a copy of the final pay stub I received before my employment was terminated, and emails between me and Dixon Brown, the former Chief

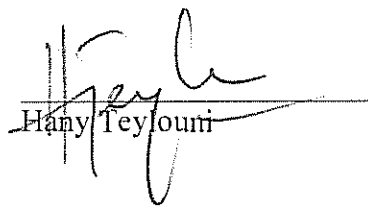
Administrative Officer of Acartha, evidencing the deferral of my salary and the agreement that interest would accrue on my deferred salary. The Receiver has never questioned the reliability of these documents as the basis for my claim.

5. Instead, the Receiver suggests that my claim should be disallowed based on a Notice of Levy she received. The Notice of Levy has no bearing on the amount of my deferred compensation and is irrelevant to whether my claim should be allowed.

6. I am working with the IRS to resolve the Notice of Levy and, if the Notice has any import in this proceeding, it requires only that the Receiver retain a portion of my allowed claim sufficient to satisfy the Notice of Levy. Indeed, disallowance of my claim would frustrate satisfaction of the Notice of Levy.

7. In the last approximately 12 months, I have been primarily overseas caring for my ailing father, who passed away in December, 2015. I presently am overseas attending to the administration of his estate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 23, 2016.


Hany Teyfouni

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2016, I electronically filed the foregoing with the Clerk of the Court through the Court's CM/ECF system which will send a notice of electronic filing to all counsel receiving electronic service.

/s/ Robert J.A. Zito