

**DECLARATION OF
DANIEL J. VOCCIA II**

I, Daniel J. Voccia II, under penalty of perjury, declare as follows:

1. I have personal knowledge of the facts stated herein and I am competent to testify thereto.

2. I am currently a resident of Orlando, FL, county of Orange. I am a former officer and employee, and founder of Wellington Pierce Holdings, LLC (WPH). I am the registered agent and signatory of the initial filing for the limited liability corporation. I was employed there from approximately February 2006 until October of 2006, when Rich Pizzuti usurped my managerial control and failed to deliver my ownership as promised.

3. WPH was incorporated in Florida on 5/23/2006. The corporation in its Articles of Incorporation was authorized with two managing members:

Richard A. Pizzuti
5380 Deepwoods Court
Sanford, FL 32771

Sharon L. Pizzuti
5380 Deepwoods Court
Sanford, FL 32771

4. From January 2004 through April 2008, I was also employed by Merrimac Corporate Securities, Inc., which was the broker dealer to which I was registered. This company was run and managed by Steven D. Pizzuti, brother of Richard A. Pizzuti. I resigned after expressly stating that R. Pizzuti's involvement with S. Pizzuti in several conflicting business transactions were inappropriate. This included \$300,000.00 transferred from WPH to Wall Street 411, a separate company run by Steve Pizzuti, that was sourced from [REDACTED] and was supposed to be used to fund the WPH startup which would franchise Volcano coffee shops and financial services company and later, corporate truck washes,

home security systems (Digital Micron), and construction helmet cooling fans (Workflow), as a legitimate revenue generating operation.

5. WPH was initially formed for the purpose of funding Volcano Coffee Shop franchises and a financial services company. This is how I represented to [REDACTED] that his loan would be used. Richard Pizzuti seized control and operation of the company by leveraging false information about my past performance during a trying period in my life where I was involved in a divorce and my public image was important for my future earning prospects. Money raised for WPH was misappropriated. Most nefarious of these incidents, was the funding of his brothers company Wall Street 411, a financial trading software company. This ended my involvement and due to the misconduct of the management it is my belief that both the company and the interests of its investors and creditors have been placed at substantial risk of harm.

6. In spring of 2005, I met [REDACTED] in Las Vegas through Lee Siler (a radio based financial consultant and a Merrimac registered representative), for the purpose of estate planning. Later, I presented the opportunity of WPH as a simple interest loan opportunity, and [REDACTED] loaned \$900,000.00 that would earn 9.75% interest over the term of one year. [REDACTED] signed the appropriate documents and I assured him that I would return him a copy with Rich Pizzuti's signature as managing member of WPH. Mr. R. Pizzuti refused to sign the document but did deposit the check into the WPH account, which he controlled. [REDACTED] was never an investor, only a lender that was loaning money to WPH.

Rich Pizzuti diverted portions of these funds to his brother's company and other endeavors that had a very limited way of returning [REDACTED] investment as originally promised, as Steve Pizzuti defaulted on his unauthorized loan.

7. During [REDACTED] trip to Orlando, on or about August of 2006, I showed him the Volcano Coffee training center. At that time, I was still convinced that the loan would be used for legitimate business purposes. To my knowledge, the amount loaned was actually used as follows: \$300,000 to finance a mortgage on a strip mall in Haverstraw NY that is in Rich and Sharon Pizzuti's name; \$300,000 went to Steve Pizzuti to fund, among other things, Wall Street 411; \$50,000 was paid to Lee Siler as commission on the loan; \$50,000 to Nick Webb's organization and associates to ghost write a book titled "The Pizzuti Principal" that was never published, and the final \$200,000 was used for building improvements and office expenses and past debt. [REDACTED] was misled in regards to the usage of his loan, and interest paid on the loan was not from the revenues of any going concerns of WPH, but from smaller influxes of cash from smaller investors. Less than 50% of the loan was actually used for any assets that could ever possibly generate real revenue that could repay the loan.

8. During the process of developing WPH, the raising of funds needed to be disclosed by my broker dealer Merrimac Corporate Securities, Inc. Following FINRA guidelines, Rich Pizzuti and I disclosed this to David Mathews, compliance officer at Merrimac, who recorded our participation in WPH on our CRD. I understood there was approval for the project by the compliance

department of Merrimac.

9. ██████ consistently requested a signed copy of his agreement, and Mr. Pizzuti refused. In February 2007, prior to the expiration, we extended the agreement 18 months with the same rate, which I signed as President of WPH. I did this to appease ██████ in the stead of Rich Pizzuti not following through on his promise. Rich Pizzuti again refused to sign this document, as he should have as managing member. ██████ requested his principle returned prior to the June 2008 expiration of his loan agreement, which promised a full return, and Rich Pizzuti asked me to talk to ██████ about not requesting his money back, as it would create a financial shortfall that WPH would not overcome.

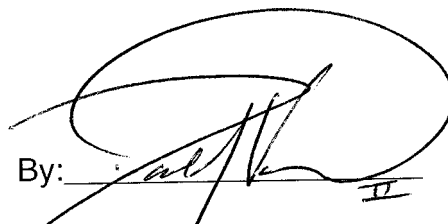
10. Despite many attempts by me to receive promised ownership of WPH, Richard Pizzuti refused. His refusal was based upon his desire to maintain operational control and vision that directly conflicted with the original business plan as presented to ██████. Although Richard Pizzuti would discuss business management with me, ultimately my ideas were stolen and perverted from their original intention and my warnings of improprieties were dismissed. To this day, it is my knowledge and belief that Richard Pizzuti has never signed a promissory note on behalf of WPH for ██████'s loan because he wishes to remain insulated and not culpable or responsible for the money although he reaped the benefits. It is clear that Richard Pizzuti expects me to be the fall guy for his transfers and diversions.

11. The gross negligence and manipulation of the company assets by Richard and Steven Pizzuti created a direct conflict of interest between their own self-interest for illicit personal gain and the legitimate interests of the company and its investors and lenders. Because the company's assets have been used in furtherance of the Pizzuti's personal gain, it greatly diminished the possibility to pay back [REDACTED]. The corporate accounting and record keeping was done by Donna Penna and approved by Richard Pizzuti. It was my understanding that documentation provided to investors was inadequate and as President I was denied access to complete financials.

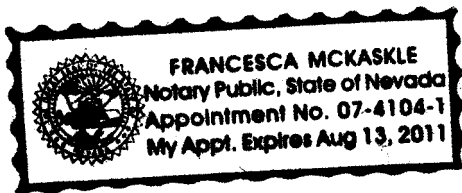
12. Besides [REDACTED]'s loan, there are other lenders and shareholders who are requesting their return of funds as promised and have received some while others have not. As a former officer, I would request that an accounting of assets by an independent third party auditor familiar with GAAP, be allowed access to books and records to discover the true nature of the assets of WPH, and conserve them. Prospects for the company have little chance for success, and change of management of WPH should occur sooner than later in order to salvage any further prospects for the company and avoid legal entanglements.

I declare under penalty of perjury under the laws of the States of Washington, California, Florida, Nevada, and New York, that this declaration is true and correct.

Dated this 3 day of January 2009.

By: 
DANIEL J. VOCCIA II

SUBSCRIBED AND SWORN to before this 3 day of January 2009.



By: 
NOTARY PUBLIC OF NEVADA
My Commission Expires: 8-13-2011