

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,

Plaintiff,

v.

Robert Dean White,

Defendant.

CRIMINAL 08-229 RHK
SUPPLEMENT TO DEFENDANT
WHITE'S POSITION ON SENTENCING

In Robert White's Position on Sentencing filed July 6, 2010, the allegation was made that by a combination of bad faith by co-defendant Deanna Coleman and Government action, Mr. White was dissuaded from accompanying his co-defendant in her initial foray to the United States Attorney's office. In support of that allegation defendant White submits three exhibits. All of these exhibits are transcripts turned over to Mr. White's counsel by the Government.

Exhibit 1 is a transcript of conversation held on 9/10/08 at 11:31 AM. The Court will recall that Mr. White alleges that during his absence Ms. Coleman had agreed to set up an appointment with lawyers in Cleveland, Ohio for a joint meeting with those lawyers, herself and Mr. White. The Court should note the bottom of page two and the top of page three. The entire transcript might also be illuminating.

Exhibit 2 is a transcript from a conversation held on 9/18/08 at 9:43 AM. The Court will please note page eighteen. Here, of course, Mr. White is trying to convince Ms. Coleman to go with him to turn themselves in and the rather obvious skit is taking place.

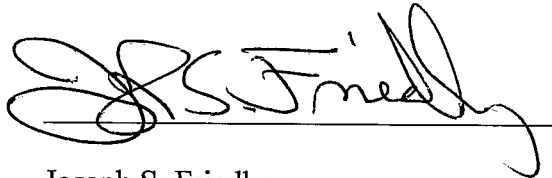
Exhibit 3 is a transcript from a conversation held on 9/20/08 at an unknown time. Would the Court please note pages two and three as the skit continues.

If necessary, Robert White will be prepared to testify consistent with the representations made in the position paper to buttress the record in support of his motion for downward departure.

Dated: August 4, 2010

Respectfully submitted,

JOSEPH S. FRIEDBERG, CHARTERED

A handwritten signature in black ink, appearing to read "J.S. Friedberg", written over a horizontal line.

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ATTORNEYS FOR DEFENDANT WHITE

WHITE EX ①

09/10/08 11:31am
1D4_0910_113153

Deanna

Coleman: It's just me, Bob.

Bob

White: Hi.

Coleman: Hi.

White: How are doing?

Coleman: Good. You, still haven't talked to Tom?

White: No. I haven't. Should we try to talk to him, or what do you think? I mean when I talked to him last night he was just saying I'm doing everything I can. You know.

Coleman: Right.

White: All very positive.

Coleman: What's that?

White: Very positive. He said I'm gonna do it. I'm gonna pull this off. I'm gonna get us out of this. I'm gonna get forced into, forced, however you pronounce it, um, to, ah. There. How's that? I get so many guests up here.

Coleman: It looks like your dog's been in here.

White: Yeah, Walter, came in here.

Coleman: Oh.

White: Um. He says he's going try and get them to get a letter backstopping it and so they'll...

Coleman: Who's them?

White: ...they'll secure.

Coleman: The, um...

White: Back--...

Coleman: Henry?

White: Back. Backstopping. Get, or. I can't say their name.

Coleman: Fort--, Fortress or whatever?

White: Fortress.

Coleman: Yeah.

White: Fortress. To do the, the letter similar to what wthey did for, um, Marlon. And so that it's secure. The, and so that the auditors won't wanna go forward. That's what his goal is. One of his goals, anyway. I don't know. Ya know?

Coleman: I don't know. Frank called and um he has all those PO's that are 182 days, or 183 days, and...

White: Yeah.

Coleman: ...he's freaking out, and I just, I'm not gonna do. And it's just, it's not possible to do that many PO's. Um, he said he needs that letter.

White: Which letter?

Coleman: From Fortress. In order to extend the notes.

White: Okay.

Coleman: Oh, and he needs ten million dollars still.

White: Yeah. Same issues as always, we need (UI)

Coleman: Yeah.

White: And so I think (UI), we ought to make a call. We ought to call.

Coleman: Call?

White: Those people, those attorneys, let's call them.

Coleman: Those, um. The ones..

White: Ya know that attorney in Cleveland whatever.

Coleman: Cleveland, Ohio? What are we going to say to them?

White: Just tell 'em that we, you know, we're in a situation where we're, we're, we're concerned about a, what, how badly our legal liabilities are. Can you give us some guidance as to what we are looking at, what the possibilities are or are not. You know, Tom says he'll take the bullet for you guys, but it, it's not up to Tom.

Coleman: No. Well, it comes right...

White: Those people will, those people will, as far as any prosecutor's concerned, we're co-conspirers.]

Coleman: Well, you certainly, yesterday in that meeting, Bob, or Tom is like, I don't know if he thinks these are real deals or what. I mean, I just didn't get that. I, I don't know if he was just trying to cover up because Jim doesn't...

White: He was trying to...

Coleman: ...know.

White: He was trying to cover for Jim.

Coleman: He doesn't know the truth.

White: I think we was trying to cover for Jim, saying that, well we did a bunch of...ya know.

Coleman: Right. You still have a lot of boxes up here. We actually have a storage unit downstairs.

White: Well, these are all the boxes you sent up here.

Coleman: I think Debbie sent them all up, yeah.

White: Oh, I don't where the storage unit is.

Coleman: Ah.

White: I just, I just feel that it's not very much incentive to try to make a pretty office.

Coleman: You ever use that office over, um, on Excelsior?

White: Yeah. I go over there. Yeah. It's nice. It's, it's private. Bought a bunch of furniture and put it in,

it's nice.

Coleman: Oh good.

White: But bottom, you know, I just, I'd just fix it up so it's a nice office and then I go over there.

Coleman: You don't have any of our stuff over there though, do you?

White: No. I have all our stuff in that white envelope. I carry it. Keep it in the car or whatever.

Coleman: Oh, that white envelope? That's where you have everything?

White: Right there, Everything is there. And, other than, so, when I'm not, I can put everything in the trunk of my car within seconds.

Coleman: In case anyone ever comes in?

White: You're damn right. I don't know what the hell am I supposed to do.

Coleman: I know. I know, I feel the same way. It's kinda like, yeah.

White: Well, the thing that's so scary to me is, you know, I've, you can take the hit for yourself, but I've got a bunch of people that depend on me, ya know? And I've got, you know, Robin and two kids right now. I don't, I hate the fact. The embarrassment to everybody and everything else. Yeah, you can take,

Coleman: Um hum.

White: For yourself, you can say all right, I.

Coleman: That's not about us. It's about.

White: Everybody else.

Coleman: Everyone that we love. Yeah.

White: Yeah.

Coleman: No. I agree.

White: And, ah, you know, Tom said some things that were true. Yeah, we took the money, ah, but, you know.

Coleman: What do you mean, we took the money? I didn't take any of the money, um . . .

White: We took.

Coleman: ...bonuses. We're not the only ones, Bob.

White: I know. I know.

Coleman: He gave everyone in the company bonuses.

White: I know.

Coleman: So it's not like we're the only ones . . .

White: Oh, I know.

Coleman: ...who got the bonus.

White: I know. I know. And, but, and he's makin' the point that you knew we were stealing the money to get the bonus and you accepted everything. But that's bullshit.

Coleman: I didn't, and I didn't get that part at all.

White: Well, I mean, he was saying you knew it wasn't real.

Coleman: Well, yeah.

White: But you took the bonus.

Coleman: Yeah. And how about his 60 some million dollars that he's taken from the company?

White: Well that's...

Coleman: I mean, shall we take ourselves off payroll? It's not real.

White: I know. I know.

Coleman: Um...

White: It's, but that's the point. I mean. The point is.

Coleman: He was doing this before I even started working for him. I was just, just too stupid and naive to figure it out until it was too late.

White: He called me. You know. He was in. I raised some money for him, but I raised it in ways that if it went down nobody, there was nothin' anybody could do about it. Okay?

Coleman: With Ken Parker, you mean, and?

White: Yeah. I mean, ya, ah, potato man. All he said they get royalties and if the business failed, it failed.

Coleman: Right.

White: The guy in Iowa, if it failed, it failed.

Coleman: And Tom paid all those guys back.

White: But he shouldn't have. The business failed. You just walk away. You say look it, we made a business bet, it didn't work out. There was nothing wrong. There was nothing illegal. And he has this notion that, you know, I got to pay everybody back. Well, if it's a business bet, and people invest in the company and the company fails, that's the way it is.

Coleman: Right.

White: Okay? And, instead he took on. But anyway, I left when it, when the, when there was no, I didn't see... The, I, I, ya know, there was no way to make money or, I mean, I, and I said good luck and they're wasn't any debt that was awful debt.

Coleman: No, it wasn't, um. But it was still. Oh, and he was borrowing money basically to support his lifestyle.

White: Well, but...

Coleman: To pay Jamie her mor--, or, her child support, and, to buy her h--, buy her, buy himself a new house, and, Mike...

White: Yeah, but it was not, It was not...

Coleman: But it wasn't...a huge dollar amount

White: It was not illegal...

Coleman: ...like he was talkin' about.

White: And it was not illegal debt.

Coleman: Yeah.

White: It wa--, ya know, i--, if...we went, if you bankrupt... people would say... damn. Ya know?

Coleman: Yeah.

White: But they didn't sue ya for fraud, or whatever. And then when I came back he was, he called me and was crying. And said, "I need two months, can ya help me get through it two months?" And I had no idea it was a hundred percent bad 'til I was, I had made, ya know, bank statements and...

Coleman: Mm hm.

White: ...(UI). I came in and said, okay, which ones are good deals? How do ya tell 'em apart? Whoops!

Coleman: Well.

White: And I, ya know I did it for, fifteen grand. Big fuckin' deal. The money wasn't, Ya know, I did it cuz if...

Coleman: Well...

White: If he gave me fifteen grand. He did it, I did it because he was cryin' and he needed help and he was a...

Coleman: Right.

White: ...friend. That's why I did it.

Coleman: And that's what he continues to do. But he just, ya know?

White: And so, then you're ch--, ch--, ch--along, and you're deep in, and, and I went, ya know what kinda irritates me I was being sucked in and being paid forty and fifty grand. And there are a lotta people here who weren't doin' anything...

Coleman: Mm hm.

White: ...bad who are making honest sums of money.

Coleman: There still are! Look at Camille. She's makin' a million dollars a year. What does she do? Absolutely nothing.

White: Oh I know. What the hell are we paying Camille for?

Coleman: Good question.

White: Cuz he give, it gives her comfort when she...

Coleman: Mm hm.

White: ...works really hard when he's say, in a crisis, and she runs around and scurries around and gives him comfort but never does...

Coleman: Mm hm.

White: ...anything.

Coleman: She hasn't accomplished one thing.

White: But it makes him feel good, and he feels like she's in there workin' hard. Cuz when the right moment comes when he's...

Coleman: Mm hm.

White: ...nervous she's a comfort to him.

Coleman: Mm hm.

White: And thinks what a wonderful person this is.

Coleman: Well he and he...

White: Cuz...

Coleman: ...tries to buy...

White: ...nobody else is here.

Coleman: ...everyone, is what he does.

White: I know. Anyway, we're...

Coleman: And people fall for it.

White: Well, I don't know. If we were to do PO's, how many are there? There are like a hundred? Are there more than we can do, or what is it?

Coleman: There's just so many of 'em, I just, I'm just...

White: I know, you're burnt. So am I.

Coleman: I'm burnt out. I just, I'm not gonna do any of it. I'm just, I am burnt out. I've, I'm done doing purchase orders, um. And it's just been a continuing, non-stop, I, ya know, and maybe next week I'll feel differently way, I just, I'm tired.

White: Well. I think that we haveta figure out if there's a realistic end to it. If there isn't a realistic end, then we should try to make a deal.

Coleman: Mm hm.

White: To get ourselves the hell out. Ya know? With the prosecutor or someone. If there is no realistic end. Ya know? Be, it's, it, it's a Ponzi scam. I should close the door. Uh!

Coleman: Probably should.

White: Ya know? If, if there is no way out then it is gonna end in an explosion. And we should try to find, figure the best way to end it, for ourselves. Ya know?

Coleman: Um hmm.

White: Um, and if it's, there is a realistic hope to get out, and I don't know where we're at in there. Ya know, as we push Tom, he said, "I don't know, I can't say. I'm workin' as hard as I can. Okay?"

Coleman: Well, and that's so, I mean, the meetings he goes to are not necessary. Ya know, he has a meeting now at noon with the media group.

White: What the fuck is he messing with the media?

Coleman: Close down the media group, it's losing how many millions of dollars, it's like, why do ya waste your time on something that's peanuts. Ya know?

White: I don't know. Well I, I don't get it.

Coleman: I don't...

White: I mean...

Coleman: I don't either. That's why I said, it's meeting after meeting, but I, ya know, are they really necessary? No, they're not.

White: Yeah. Well. Well, it's, it's, ah, We've gone through the emotions. I wanna sit down and have a heart-to-heart with him, I think. Say ya know you're goin', ya know? I don't know if it does any good, but...

Coleman: Right.

White: Ya know?

Coleman: Maybe all three of us should.

White: I don't think it should be Jim. Just you and I.

Coleman: Right. I'm just talkin' the three of us.

White: Yeah. I think, uh...

Coleman: Should I see if I can't schedule one tomorrow morning with DeAnne?

White: What day is it tomorrow? Thursday?

Coleman: Thursday.

White: Yeah. Sure. Well. A scheduled meeting is just a...

Coleman: I know, it's a joke, but even if we haveta go over to his house or whatever.

White: Yeah. I think, let's try. Let's try to figure out...

Coleman: Let's see if I can't get something scheduled.

White: Yep. I don't know, then there is a, ya know, and he'll

say cuz he's said to me, and I'm sure he said to you, "I'll take the bullet," he'll try to shield you. How do you shield somebody?

Coleman: Oh he's, and he's told me that many, many times. He'll take the bullet, he's sorry what he's...

White: Yeah I know.

Coleman: ...done to me. He's sorry he got me involved in this.

White: Yeah, right.

Coleman: He's doesn't. And, I...

White: And he...

Coleman: ...don't know how many times...

White: ...ya know, and, and at the moment he is, very sorry. Okay?

Coleman: And he, I'm sure he is sorry.

White: Mm hm.

Coleman: But the fact is that he's done it, and, ya know what? I, we probably could've gotten out of it if we woulda put a stop to it ten years ago, or, ya know? It's just, and he's...

White: When I came in...

Coleman: ...just gotten way out...

White: ...we were a hundred...

Coleman: ...of hand.

White: ...million dollars in debt. Of all fraud.

Coleman: Oh.

White: Okay? Ya don't walk away from a hundred million dollars in debt. It isn't gonna happen. Ya know? I mean...

Coleman: Oh, but...

White: ...they'll, that's a big lotta money.

Coleman: Oh yeah. Well, and now we're three and a half billion.

White: Yeah. Which is...

Coleman: So it's...

White: ...historic.

Coleman: ...probably even more than that, that's just PCI, and there's more, I know. But.

White: Yeah, but those aren't illegal debts. I don't give a fuck about anything that's not illegal.

Coleman: No, Polaroid's not, and those are not. But..

White: No.

Coleman: ...PCI's a hundred and fifty million dollars. A hundred...

White: Right.

Coleman: ...and fifty. No.

White: It's...

Coleman: 3.5...

White: And he...

Coleman: ...billion.

White: Yeah. And, so I mean, Sabeses. I would like to get paid.

Coleman: So I guess um they want two million by this Friday. And I don't have it, I don't know where Tom's gonna get it.

White: And he's tryin' to borrow money. And he's tryin' to borrow his way out of it. Ya know. Well. You know what you oughta do? You oughta just go take off for a week. I mean, he's got, and he's. Just try to clear your head.

Coleman: Well. I'll wait and see if Tom comes in or if he wants to get together, and, I don't know. Maybe around two or three I will.

White: Well...

Coleman: And then that's, what, ya know, he, he's always... sayin' about Jim Wehmhoff and how we're not doin' anything.

White: What the hell does he think we do?

Coleman: Uh huh.

White: Ya know?

Coleman: Well.

White: I live in a fuckin' box up here.

Coleman: Um huh.

White: Drawin' up people's damn shit. Tryin' to, and...

Coleman: I don't know, he just hasn't been the same.

White: Ya know what bothers me is, too, is that. Um. That, the few things that I try to do that are good, that, ya know. Zink is, if there's anything savin' our neck, it's Zink. Okay? Cuz that gives Polaroid some--thing, and we work for Polaroid and so on, and ya know, and Zink goes totally with the deal. And he, and he fuckin' fights me every inch of the way 'til (UI) how much is he gonna get or whatnot, ya know? And then, just...

Coleman: Mm hm.

White: And I'm tryin' to do the Solar right now? Okay? And all I need is Tim. All I want is a non-exclusive right to use the pass. The, that he'd...

Coleman: And he want...

White: ...go ahead and sell and do whatever he wants. And I go down and talk to Mike, and Mike is tryin' to say, "Well, Tom is wondering how much royalty he should charge ya." Fuck him.

Coleman: Ha ha!

White: Ya know? Fuck. It's stoppin' everything. I could get something going. Which would be some value o--, on the outside, and I said, "I wanna have it totally outta here. I'm gonna give you a bunch of my Zink stock as payment for a non-exclusive right to the thing. And so it's the hell outta here and no connection."

Coleman: Right.

White: And maybe we'd have some money as a way to help us esc, ya know.

Coleman: Mm hm.

White: Cover our ass somewhat. But ya know, he's gotta dink around with, well, I'm gonna try and charge ya with this or that, I don't wanna get screwed, cuz I'm not gonna let Bob take advantage of me. Ya know?

Coleman: Right.

White: I've only fuckin' laid down my life and gonna die of a heart attack over this for this prick, and it just pisses me off. So, I'm gonna, and I haveta have that conversation. I mean, just so many pent-up anger here about about some things, he'll just, and it's just needless.

Coleman: Uh huh.

White: I put a whole buncha work into figuring out how I can do Solar. And it might be worth a lotta money. And he's gonna. I'm not gonna do it within this organization, I can't. I can't function on a daily basis. And I don't want it connected it to this organization because if things go down, it goes with it. So I'm tryin' to set it on the outside.

Coleman: That's that...

White: Ya know?

Coleman: ...um, deal you're doing with, um...

White: Ernest.

Coleman: ...Ernest?

White: Yeah. Ya know?

Coleman: What is that again?

White: I think we can make solar panels.

Coleman: Oh, solar panels.

White: But I think, it takes time to do it. It's not, it's not a overnight project. But, all I need is a couple signatures, and, and I can get, things movin'. Ya know?

Coleman: Mm hm.

White: It's just like...

Coleman: Speakin' of Ernest. Um, I don't know why I thought of this guy. I can't think of his name. And he owes us five hundred thousand dollars?

White: Steve Canzuga?

Coleman: Yeah.

White: Yeah.

Coleman: Are we ever gonna get that money from him?

White: I don't think so, and he's got, and he's basically went belly-up, bankrupt. Ya know. So.

Coleman: Yeah.

White: No. Um. What was I thinking? Oh, I know, (UI), it was a normal, typical way we do something is go part way and then at the moment when you need to carry it forward, you cut funds and say I'm not gonna do anything. This was a, it's...

Coleman: With Steve?

White: Yeah, it was a spark plug.

Coleman: Oh. I wasn't really a night...

White: It was a, it was a spark plug, and we...

Coleman: All I know is I was gone, and...

White: Yeah.

Coleman: ...ya know, Tom was a little upset, and borrowed him five hundred thousand.

White: Well. It was a s--, it was a spark plug that a different type of spark plug that reduces pollution and re--, increases mileage significantly that, and General Motors put forty million bucks into developing. And because they divest it, we're forced to divest of, of that part...

Coleman: Mm hm.

White: ...of the company, it ended up, Steve got a hold of it. And we could've had the whole thing, but we didn't do anything more with it, and we had a guy with the Department of Energy saying he would, he would, like, make mandate it, and they could mandate it, for non-pollution, right from the beginning, just a little...

Coleman: Well we didn't...

White: ...problem.

Coleman: ...tell 'em we were gonna fund the whole thing anyway, did we?

White: No, but, it, it just would've taken a. No, it's just that there was an opportunity to do something.

Coleman: Right.

White: Just like Fingerhut. At the la--, at the wrong time, we back away and let. "I'm not gonna put any more money in it" and let somebody else take over, now we don't have anything.

Coleman: Mm hm.

White: And the battery thing that we came up with? We didn't, we didn't put money in, at the time when we needed to, and now we owe 'em nineteen percent and have no control over it. It's just...

Coleman: How's the battery thing doing?

White: I think, well. I mean, I don't know. I, I, I have...

Coleman: Hm.

White: ...no way to know. Tom Hay and George Danko took it over, and I didn't have anything to do with it.

Coleman: Hm.

White: And, they sold it off. What I heard is that it's doing well and that and we don't have much. I mean, they've developed it. There is this a thing.

Coleman: So if we've sold it off, where did that money go?

White: What do you mean? Wait. Oh, okay, here's w--. You can get a c--

Coleman: We needed more money, so we ended...

White: It needed more money...

Coleman: ...up selling shares. So we didn't sell any of it off, we just...

White: We didn't sell any, but...

Coleman: We didn't write. Okay.

White: At the time they needed, like, four million bucks or...

Coleman: Right.

White: ...something like this? We said we're not doin' anything. And so somebody else came in and...

Coleman: I think they went out...

White: ...and took control.

Coleman: ...to, um, employees.

White: Well. I don't know who all...

Coleman: Cuz I remember getting something on that if we wanted to invest in it.

White: Well, see Tom Hay I believe shuffled a good deal off,

and sold to his buddies. And...

Coleman: Yeah. Probably.

White: And, I know. And so. At the point where ya say, when Tom is saying, "I'm not puttin' any more money into any technology." Ya know? There's times when ya put, put money in, and there's times, we would put in millions of dollars in absolute stupid shit.

Coleman: Mm hm.

White: Like this goddamn real estate project in Aspen.

Coleman: Actually, I think that's gonna do okay.

White: What kinda fuckin' D-. Do ya know where it's bui--, what it's built on, what it's supposed to be on? It's on a toxic waste site. You can't build on it.

Coleman: Huh uh. That I didn't know! I just heard that it's gonna be okay.

White: Oh, fuck!

Coleman: That it'll do okay.

White: And, and we're ignoring the fact you can't get a building permit because it's on a toxic waste site.

Coleman: Don't they have a building permit yet?

White: I don't think so.

Coleman: Oh really?

White: I, I may be wrong. I'm pretty sure. Bec--, I at the brokerage firm we got some land in a neighboring community to build a casino that was toxic from the mining. We're h--, we had to remove all the dirt down, like, forty feet. Take it all off and burn it. To get rid of the toxic stuff. It's possible to do it, but it's a big expensive project.

Coleman: Wow, I didn't know that.

White: And...

Coleman: I'll haveta ask Tom Hay about that. But all I hear from Tom Hay and that is that it's, we're gonna make a lotta money on that.

White: Right.

Coleman: Hm.

White: And only, they got, they got permit to be able to do something there. Um, there's a couple processes ya haveta go through. If they've they've just put in low hou--, low housing, along with the exclusive housing. So there's some cheapo ones. I don't, I don't know.

Coleman: (UI)

White: I've heard, I, I know, and the only, my only source of information is Brad Dennis' uncle is a contractor and built in, um, built a good percentage of Aspen, Colorado, and that's how Brad got his money, he inherited from them. A--, and he talked to them before he invested in, they say, I know the lot and he described it, he said it's a toxic waste site, you can't build on it. And Brad told Camille and Camille said, "Oh, we got that all taken care of."

Coleman: Hm.

White: So.

Coleman: I'll haveta ask Tom Hay how that, how that project's going.

White: I don't know. All I'm saying is that we pour money into...

Coleman: Mm hm.

White: ...dead-end losers. Where, if they do work from his media group.

Coleman: I know.

White: If it does work, what are ya gonna make? A, a hundred dollars? I mean...

Coleman: Mm hm.

White: ...fuck!

Coleman: Well, same with the retail stores. We're losing money, but if we...

White: We should...

Coleman: ...if they ever...

White: Maybe we should just...

Coleman: ...were to turn around, we wouldn't even make a half a million dollars a year. It's...

White: I know, so why are wasting our...

Coleman: I don't know.

White: ...effort, time, money, and...

Coleman: Yeah.

White: ...so on. It just doesn't make any sense. We put money into things that if they do work don't go anywhere. Can't go...

Coleman: Mm hm.

White: ...anywhere, there's no potential. And the ones that potentially could be worth enormous amounts, but we say we're not puttin' any money into it.

Coleman: Yep.

White: And Tom's driving me, complaining, Tom says, "Well you can come to any meeting you want to." Well, what the fuck. What a joke.

Coleman: Well. Well and then, But then we don't ever set a, set up the meetings, so. I'll set up one tomorrow, and...

White: Well. Ya know, I'd like to, his schedule. And, yeah, I bet if ya look at his schedule it's packed. But what it's packed with?

Coleman: Yup. Exactly.

White: Eighty percent.

Coleman: Eighty percent of the stuff he's doing, he does not need to be doing.

White: And he says, But, ya know, there is a truth to it, he says, "If I don't do some of those things, I don't get feelin' good about myself and I can't do the other." And, but there's a balance. And, and, I'm just...

Coleman: So he tries to shove everything off on us.

White: I'm just grousing. And if there's...

Coleman: Mm hm.

White: I feel like it. I don't even think he even. Ya know? I gotta tell ya, it's not...

Coleman: Well, I'm gonna go down and have lunch. I'll see if Tom...

White: I don't know what I'm gonna do.

Coleman: ...doesn't have anything this afternoon. Otherwise, tomorrow morning.

White: Yeah. What are we gonna talk, what are we gonna say? I mean, I don't know what, why he had conversation with us today, I don't know that he reflect on. I mean he doesn't know how realistic things are. Even if we push him he's gonna say, "I'm workin' as hard as I can." What do you want me to do, quit?

Coleman: Right.

White: I mean, that's the conversation.

Coleman: Well, at least we can get an update on it. I mean, I don't know. Can try.

White: Yeah. I think I'm gonna go out there to lunch somewhere.

Coleman: Okay.

White: AHHH! Well I didn't mean to unload on you, you don't need. You needed two thumbs rather than me yellin' at 'cha and, but...to be pumped up

Coleman: No I'm, I'm fine.

White: But, ya know? It is (UI)

Coleman: Good. Yeah. You have such a mess in here, Bob.

White: Ya know what?

Coleman: I know it doesn't matter, but..

White: Once it, Ya know? I've cleaned it up a couple times.

Coleman: Huh huh. It's fine, I mean...

White: I know. Well. Kinda, I was starting to try to make a nice little office. And I said to John, after I really wanted the desk so I can be over by the window. And he said, "This is the only desk we have."

Coleman: That looks like it could be...

White: So I brought...

Coleman: ...(UI)

White: ...i--Well, I brought in those that I had, and I'm just and tryin' to set things up and just I just said screw it. I don't care. Ya know? Really.

Coleman: Well, I hear ya.

White: All right. Where do, where is the storage, I, I know I'd love to have...

Coleman: Um...

White: ...the cardboard boxes the hell outta here, as much as anything.

Coleman: Okay, I'll have, um, Art come up and put all the stuff in the Petters Company storage on the first floor. This is all (UI)

White: Tom gre--, started going through all the boxes right there, and so he's...

Coleman: Why?

White: ...got this th--Oh, he just grabbed the boxes and started looking, "Why do you got this stuff up here, Bob?" I don't know. I said, "I don't know. It's storage, Tom."

Coleman: Maybe we could, um, put 'em back...

White: What?

Coleman: ...then? Here, you...

White: All right.

Coleman: ...put the stuff back? God, this is a mess.

White: Well, ya know, I don't even know what any of it is, so I'm,

Coleman: Boy, what a mess.

White: Yeah that's, he started looking through it.

Coleman: He must know what it is. Throw things out?

White: Yeah.

Coleman: So what did he, just take things outta the boxes and start throwing 'em around?

White: Yeah.

Coleman: Unreal.

White: Ya know, I don't know what any of it is. I never, ya know. I don't.

Coleman: BLS.

White: Well, I didn't even know what BLS is.

Coleman: That's that lawsuit on the handbags. Coach, um...

White: Ch--, ch--Well. (UI)

Coleman: This. All the different gem cars.

White: For what? Gem cars? Yeah, beautiful. (UI)

Coleman: Okay.

White: All right. I'll walk down to the van and meet 'cha.
Sure you're gonna (UI), girl.

Coleman: Um. No, I just gotta go and check my e-mails. And then
I'll go downstairs and have lunch.

White: All right.

Coleman: I'll meet ya down there.

White: All right.

WHITE EX (2) ~~Bob~~

09/18/08 9:43am
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Bob

White: Hi.

Deanna

Coleman: Hi.

White: How are you doing?

Coleman: Good. How about yourself?

White: I'm (UI) you see I need some documents (UI) or I got a disaster. And basically it is saying, and when you look at things, there are purchase orders, the invoices for merchandise, shipping records to the warehouse, warehouse records, shipping records to the retailers, invoices to the retailers, letters from retailers payments, I don't know what else there is, Tom didn't provide any.

Coleman: Did he say what he wanted?

White: Do you remember the conversation the other day we had with him?

Coleman: With Tom?

White: With Greg Bell, he called, we were both sitting here.

Coleman: I think I remember that, I kind of remember it, what all did he ask for?

White: He was saying, he was saying, I need some, I need help, I need, I need...

Coleman: Oh, yes, yes we need the bill of ladings and some um letters from BJ's or Sam's and the warehouse um, showing that inventory.

White: We're gonna have a bunch of auditors looking at stuff, and we're not gonna (UI).

Coleman: Uh huh.

White: I don't see, I, every group that we got has come to the

end of their line and is, um, and they are asking for documents, they're asking for proof for the amount of (UI) they all think it's bullshit and I don't see how we can get through it.

Coleman: Right.

White: I mean, (UI).

Coleman: Should we have a conversation with Tom and see what, I mean, he talks to Greg Bell almost daily.

White: Yeah.

Coleman: See what Greg's been telling him.

White: No, Greg asked me how I was coming in getting the documents together and I said well I've asked for all of the documents but I don't have anything yet. You know. Um, he said should I talk to Tom and ask him to put pressure on (UI). It's imperative that we have 'em.

Coleman: And he didn't say what documents? It's just the bill of lading?

White: Same conversations that we had. Which was I need some proof at the warehouses, I need some shipping documents to the warehouse, out of the warehouse anything, just anything that will convince people this, he just needs something that will convince people the merchandise exists, it's sitting there in storage.

Coleman: Who are Greg Bell's investors, do you know?

White: No. I assume they're, I assume they're insurance companies and a variety of people that are insured by AIG and whoever the.

Coleman: Let's hope it's not AIG. Let's hope it's not AIG.

White: What, why not? They got, I mean, what I heard this morning it's literally trillions of dollars that are insured by these people, all the banks everywhere, in big transactions, and if they go down, then the banks (UI) meltdown, the whole world melts down.

Coleman: Not um, good.

White: No, I think we should call an attorney and get some advice. (UI). I think we're at the end of the line, or pretty close to it.

Coleman: You don't think Girard or any of those guys are gonna come through for Tom?

White: No, Monday is the day that, I mean, what, what the hell are they gonna do, how are they gonna, how are they gonna satisfy these people so they don't ask for redemptions for...

Coleman: Well, what did Tom, what is Tom saying anything more about selling Polaroid for 1.5 billion?

White: I haven't heard anything.

Coleman: Which I find that hard to believe that he could sell Polaroid for 1.5 billion.

White: Polaroid's worth 3 billion, half of it to Girard for 1.5. I think the sale to Girard is phony, to help put the value up for everybody else.

Coleman: Why do you say that?

White: I just believe it.

Coleman: Do you think Girard would do something like that? He would play the game?

White: Yeah. I think so. Help me get this sold. You buy half for 1.5 and sell the other half to, to the Russians. They'll think the value is right. You don't really buy it. You just need a purchase order or whatever, letter of intent. I don't know, I don't.

Coleman: Hm.

White: Maybe Tom, maybe he does. Yeah, I don't know. Nobody parts with a couple hundred million bucks very easily.

Coleman: Right.

White: And a billion five is, you know, his entire net worth. And he's not blowing his entire net worth or whatever, or Polar-, a big amount of money because he thinks Polaroid, I mean, it just doesn't, I don't know. When

you go through the list of things, now, shipping records to the warehouse, (UI) to the warehouse, why couldn't we provide that? Why couldn't we provide payments to the warehouse? Why couldn't we provide...

Coleman: Payments to the warehouse, what do you mean by that?

White: We, somebody's, show, I mean, I'm pretending I'm Greg Bell.

Coleman: Oh.

White: Why can't you show me some evidence that you have a warehouse.

Coleman: He's asking for that?

White: No, no.

Coleman: Oh.

White: I mean, I'm pitching you know, if we say well we don't have any records of it going in and out of the warehouse...

Coleman: Well, how can Greg Bell even believe that all this merchandise is in a warehouse? We basically use, well right now I'm only using three warehouses for him, um, but we only have five total.

White: I know. But...

Coleman: And you're looking at what, 1.2 billion?

White: Well, it's gotta be at the retailer...

Coleman: 5 warehouses.

White: It's gotta be at the retailer.

Coleman: So then the retailer is 6, um 6 months past due?

White: Well I mean, there is, I'm just saying, there's, it's either at the warehouse, or it's at the re-, retailer, if it not at the warehouse then it's at the retailer. Show me the proof that it went shipped to the, something, show me something, some shipping documents, show me something or okay give me a letter from the

retailer. You know, that letter from the retailers, they're gonna call that person and say,

Coleman: Right.

White: ...hey, I wanna ask you about this letter.

Coleman: Do you have letter, do you have those two letters he did from BJ's and Sam's?

White: I have one of them.

Coleman: I should get a copy of that, just to put in the file so we have it, so if Greg asks for it again.

White: You gave, you know, the problem is, I gave them to Tom and then he, I shouldn't, and I didn't want to have the goddamn things. So.

Coleman: No, I know.

White: So I just gave them to Tom and he's, and so. Frank got two letters.

Coleman: Oh, I didn't know Frank got the letters.

White: Frank got letters and, and Bell got letters.

Coleman: You don't have any of them. Just the one?

White: I only got one letter.

Coleman: Okay.

White: Well. I mean, it's this whole, I give, Tom is saying I gotta have these letters exactly, you know, da-da-da-da-da, and I, I hand deliver 'em to his office, confidential envelope, here are the letters and

Coleman: He loses them.

White: ...a month later, he says, do you have those letters, I never gave 'em, you know, I said no, no I gave 'em to you.

Coleman: You gotta, Tom doesn't keep any-, he loses everything.

White: Well it's his fuckin problem, it's not mine. You know.

Coleman: I, I agree, I know. I...

White: If he does, don't come yelling at me and you know, I'm, I'm just saying. Um. Anyway. I don't um. I, I'm not quite sure what to, where to turn at this moment. I don't know what Tom has in his mind. Remember he, the e-mail, or, I know how to get through this. It will work, something or other.

Coleman: Uh huh.

White: I have no idea what he's thinking.

Coleman: I don't either. He doesn't open up, he doesn't, you know, he...

White: He doesn't, I don't think (UI).

Coleman: Well, it's like that one day in his office he's complaining to us that we don't communicate. I'm going, we don't communicate? He doesn't communicate. Let's have a conversation with him again today. See what happens. See what, I mean, Girard, has been going to come through for how long now, see if that's still on or what?

White: Yeah, he's gonna say, I don't know.

Coleman: I know has a meeting with that Ramey, do you know who Ramey is?

White: Ramey?

Coleman: Or Ramey.

White: Yeah, Ramey someone, I've spoken to him. He's another one of these people like AJ or anybody else.

Coleman: Cuz I know, Ramey, I think, I heard once anyway that he might be coming to town tonight, tomorrow? I can't remember.

White: I don't know. I have a meeting at 2:00 out of the office.

Coleman: With who?

White: That I'd like to go to (UI). And, um, I don't have to go to it but I'd like to. And I missed it once already and set it up again.

Coleman: Okay, well, we have a conference call with Tom and Larry and myself at 10:30, so maybe right after that we can get together?

White: Hm. What time is it now, it's almost 10:30 isn't it?

Coleman: Um, it's 5 to 10.

White: Alright. I think you and I should call an attorney just to get an idea.

Coleman: Just to find out what?

White: It's not gonna hurt anything. We should make that call. I think it's, we're insane not to do it.

Coleman: Mm-hm. No, I agree.

White: Well.

Coleman: Well, let's see what Tom has to say. Um.

White: Yeah, it's, you know, it's interesting. If you watch the way, one or the other of us is always fucking (UI).

Coleman: I'm down and then you're down. We go back and forth, and then Tom gives his little pep talk and

White: And we say...

Coleman: ...tell us he's gonna get through it...

White: And we say well maybe there's hope, you know. The march...

Coleman: We should have um, what we should have done is 10 years ago said forget it, we're not doing it, 15 years ago.

White: I know. Well it's wasn't that long ago, but it was a long time ago.

Coleman: Well since day one since I walked in to Tom's office.

White: Yeah, yeah, you absolutely should have.

Coleman: I should have just turned around and walked away.

White: Yep. But we didn't. Alright? Shoulda, woulda, coulda, all that stuff is great but it doesn't....

Coleman: It doesn't help now.

White: No. You know, you listen to all his platitudes of your word is all you've got and your honesty and your integrity is really all you really have. They're absolutely joking.

Coleman: Mm-hm.

White: But you, you, it's so easy to, um, think well this, this doesn't hurt, all I'm doing is helping do something, I'm not really, but the truth is, it's an integrity issue that you learn as a little kid and you know it when you're doing it wrong and there's no question in your mind if this is crossing the line...

Coleman: Yep.

White: And you let it happen, and um. When I had the boat company, see every other deal that I've gotten involved with has been not illegal but it's like, okay, the boat company is in trouble, we're not getting sales, should I lay everybody off, should I shut the business down or keep it going? Can we continue to borrow money when you owe money and so on, but none of it was illegal, you know what I mean? And so then, when you finally said I give up it, there's no way, I mean...

Coleman: Did you pay back the investors from the boat company?

White: No. They didn't, there's no reason to, I mean, they made a business debt, and so, we raised some money, we ran a business for like five, six years. The boat industry, the entire industry went down the tube.

Coleman: Right. I remember you telling me that.

White: Yeah, I mean, like with the big sailboat we made one year was a 120 of 'em sold and the next year was 18.

Coleman: Wow.

White: I mean.

Coleman: One extreme to the other.

White: Yeah, it just went.

Coleman: So did you have a lot of people get hurt then, when you closed down a company?

White: People bought some stock, and then their stock went too. But it's not, I mean, there was a total of \$500,000 that was raised. Okay? And...

Coleman: Which back then was, well, it's still a lot of money today. But back then it was still a lot more.

White: But it was all sold in...

Coleman: Stock.

White: ...5,000 share, \$5,000 to a person.

Coleman: Okay. Who's this? (UI). This is Deanna.

Steven

Young: Hey, Deanna. This is Steven Young.

Coleman: Hi, Steven. How are you?

Young: I'm good. I'm good.

Coleman: How was Africa?

Young: Oh, it was beautiful. It was beautiful. Although it seems like while I was gone, uh, everything was falling apart.

Coleman: Ugh, no kidding. A lot of uh, lot of changes since ah you got back I bet.

Young: Yeah, no doubt.

Coleman: Yeah.

Young: Just unreal. And we were pretty much in contact uh, I had a friend who's a hedge, is a hedge fund operator and he was um, ah, you know he was constantly getting updates. Um. Yeah it sounds like it was pretty awful.

Coleman: Yeah.

Young: Um. How's everything going with y'all?

Coleman: Good. Good.

Young: Good, alright. Um. Yeah. I, I know a little bit about the Acorn deal from talking to Dad.

Coleman: Okay.

Young: Um, just, I mean, I just, you know I have to be, I guess, you know, with you and me if my investors found out anything um they would probably freak out.

Coleman: No, and I, and I understand that.

Young: Yeah. With everything that's going on um, and so any information you know, you can give me as it goes along, please, you know, please forward it to me.

Coleman: I will. I think Bob White has um, something that I can probably forward on to you, um, and I wish I could explain the whole situation, but I know Tom and David Baer has been working on it and they've been dealing with it and I know it's somewhat taken care of, um, but I just, I don't know all the details on it.

Young: Sure, no, no and I got ya. That's wonderful, you know, so whenever you find that out that's the stuff that I need.

Coleman: Alright, you know what, or even um, you know, Jack, I know, still talks to Tom Hay quite a bit, even if Jack wanted to call Tom Hay, he would probably even know a lot of the details.

Young: And he will and I think Dad's already talked to him.

Coleman: Okay.

Young: Um, but I just, I didn't know um, I, I wanna make sure that, you know, that, that between you and I we can get you know any information we can get to insure...

Coleman: Right.

Young: Um, what about paying off, when, when are you thinking?

Coleman: Um, I am not sure on that. Um, I will know more

probably the middle of next week.

Young: Okay.

Coleman: If that's okay? I know it's not gonna be this week.

Young: Okay.

Coleman: Um.

Young: Okay.

Coleman: Unless a miracle happens, but I don't think it will be this week. I'm meeting with Tom later today and that might even give me some more look on the future, um, you know, when we can pay it off, um...

Young: Alright.

Coleman: But otherwise, you know, why don't I, if I hear anything I'll call you, otherwise I'll give you a call Monday or Tuesday.

Young: Okay. That'll work.

Coleman: Okay.

Young: That'll work.

Coleman: Alright.

Young: Thank you.

Coleman: Thanks, Steven.

Young: Okay. Bye.

Coleman: Bye. They have three notes, two notes that were due beginning and, beginning and middle, no, yeah, beginning and middle of September, um, but he went to Africa.

White: Yeah, I remember the note. To hold the payments till after that.

Coleman: Yeah.

White: Geez, we gave your clients, you didn't want your

payments, we sent them to somebody else, I knew...

Coleman: Ah.

White: There was a guy when the boat, when the boat company was collapsing, um, we shipped him like a, 80 horse outboard motor and it arrived at his house, like it was supposed to do and everything else, and the company was like nearing collapse and I was trying to get things out to as many people as I could, and he didn't like, I don't know what the, the box on the outside was all, all, it had gotten wet,

Coleman: Mm-hm.

White: you know, it's just a big cardboard crate.

Coleman: So it didn't look pretty.

White: Yeah, so he refused the shipment. The shipper asked, what do I, going to do, I said just go down to deliver it to this person instead so that guy got nothing.

Coleman: Did you guys file bankruptcy, or did you just cl-, yeah...

White: I, yeah, we were forced into it. And it was just um, I don't have any regret. I don't have any bad feelings about it. We ran a, you know.

Coleman: It just didn't make it.

White: Well there wasn't a boat company that survived us.

Coleman: At that time. Right.

White: Yeah, I mean, interest wates, interests rates went crazy. Bank of America said we will no longer give loans for non-essential things like boats and...

Coleman: Wow.

White: And Carter proposed that ta-, not selling gasoline to for uh boats for sporting use cuz we had to conserve on our gasoline. You know. I mean that was all like...

Coleman: I don't remember any of that. I must have been pretty young then.

White: Well it was in ah, ah. Yeah, you were. It was in uh, like 1980.

Coleman: Oh, I should remember that then.

White: Well, it was, it was...

Coleman: Cuz I wasn't into...

White: Interest rates went...

Coleman: Right, I do remember that. But I guess I wasn't into boats. I didn't pay attention to the boat industry.

White: I mean it was just like, yeah. I mean it was just, boat, it's, it's an extra thing. So it...

Coleman: Yeah.

White: When times get tough, people stop buying boats.

Coleman: Right. No, I do remember where there was, yeah.

White: Yeah. I mean it's, and then when times get good, that's, then they come back.

Coleman: I just don't remember the gasoline part of it. But...

White: Yeah.

Coleman: I wasn't into boats and I probably didn't pay attention.

White: There was an oil embargo.

Coleman: Yep.

White: And the gasoline lines were bad and Carter was saying, he was proposing, it never happened, but he was proposing that maybe we shouldn't. Gasoline should only be used for essential use and so on, and not. And you know, and so, there wasn't. Everybody went down the tube.

Coleman: Right.

White: So it wasn't like it's, so it was not anything to uh, to be ashamed of or anything, but it's just what was

happened in the times and we had done nothing wrong. But it was still an unpleasant experience. I mean.

Coleman: Right. It's still not fun. It doesn't matter, yeah.

White: I mean it was a bad time in my life.

Coleman: Yeah.

White: The boat company goes belly up, Mitch leaves, and the house burnt down. Other than that it was...

Coleman: Sound like Bill Dunlap now! My wife is in the hospital having a baby, I'm taking my ex-wife to the nursing home and...

White: His ex-wife's in the nursing home?

Coleman: Yeah, well. His ex-wife is probably Bill's age.

White: I'm sure, or a little older. Oh God. Well. But this is um, this is a whole different type of thing.

Coleman: Mm-hm.

White: You know, there I could look a person in the eye and say, Look, I worked hard and did my best. The whole industry collapsed. You know? I lost my shirt.

Coleman: Right.

White: It was a (UI). If it worked well it would have made some money. It didn't work.

Coleman: Well, what do you think. Can you sell Zink? What do you think you could get for Zink, anything?

White: Not really. I mean, it's, it's um...

Coleman: You couldn't get a billion or two for it?

White: No. But if you know, it isn't. At this moment Tom owns (UI), not here. Not...

Coleman: How much does Tom own of Zink?

White: Over 50 percent.

Coleman: Is that Tom individually, or is that Petters. Well, you said that Petters Company doesn't own it, they switched it to Petters Group?

White: Petters Holdings.

Coleman: Or Petters Holdings.

White: Yeah. Or PGW. Petters Group Worldwide Holdings, Inc.

Coleman: So the stock is in Petters Group Worldwide Holdings and not Tom's name though, right?

White: Right.

Coleman: Yeah okay. That's good.

White: So, um...

Coleman: Well, let's have a call, or let's sit down with Tom again.

White: How are we supposed to do this call at 10:30. Do you think it will actually take place?

Coleman: Yeah, well. Um. Tom, Larry and I had a call yesterday. Larry knows everything.

White: Yeah. I know. I remember you told me you talked to him afterwards.

Coleman: Yep. So we're going to have another call to see about what we're gonna do going forward. Um. Jim Granat wants (UI). I told you this. I e-mailed this to you. He wants to get information, so I think we're gonna have a conference call with Jim Granat.

White: Who's Jim Granat?

Coleman: He's with Ark Royal, Ark Discovery.

White: Oh, okay.

Coleman: So.

White: I think we actually hurt ourselves to have everybody sitting there on the phone cuz then it sounds like, you know, we think it's a big traumatic deal.

Coleman: What do you mean everyone sitting there on the phone?

White: I mean if, you're talking to Ark Royal and you have Tom, you and I and Larry all sitting there.

Coleman: Oh, uh, no, I think it should just be Tom and myself. And I'm sure Tom will get out of it. So then Larry will join in.

White: I'm just saying that if you're going to have six people all gathered together and you want to find out about what's going on. (UI). It implies (UI).

Coleman: Well I understand that Bob, but everyone calls me. They don't call you.

White: No, no.

Coleman: (UI)

White: No, no. I'm not suggesting that you take this alone.

Coleman: Right.

White: I'm saying that, I don't think it's wise to have everybody.

Coleman: No, I agree. To have all three of us plus Larry, no. Um, Tom said he'll do a conference call with me and we'll see if that happens or not. Like I said, he got Larry involved because he doesn't want to do that dirty work anymore. He wants someone else to do it. He's always wanted to get Larry involved in it.

White: Yeah, but.

Coleman: And he is involved now.

White: Well, you see the problem if you go, the truth is as far as the courts are concerned Larry's receiving money and wiring it back.

Coleman: Mm-hm.

White: And, you get money in from this person and you turn and wire it right back. It's pretty hard to say you weren't aware of it when you get these tremendous amounts of commissions for doing it.

Coleman: What do you think Mike Catain thinks about this?

White: Same thing. (UI).

Coleman: He's gotta know. But I've never once said anything to him about it and he's never asked.

White: He doesn't care. He's getting money and he's built a place in Costa Rica and his office in Costa Rica. He wants to stay the hell out of the country.

Coleman: (UI) he told me that he's going to spend more time in Costa Rica because his wife has cancer or something. Um, and that it just helps to be in a warmer place. So he did tell me that was going to spend most of the winter in Costa Rica.

White: Mm-hm.

Coleman: Well, let me find out.

DeAnne

Anderson: This is DeAnne.

Coleman: Hi.

Anderson: Hi.

Coleman: Hey, um. Bob and I need to talk to Tom just briefly before or after the call with Larry.

Anderson: Okay. All right. But he's in with Mary and David briefly. Then he's going to call Girard.

Coleman: Okay.

Anderson: So, um. I'll have to find him before he comes over. Or I'll have him come over before he makes that call.

Coleman: Okay, yeah.

DeAnne: All right.

Coleman: Sounds good. Thanks. Well it's going to be a half an hour.

White: So he's gonna call. I didn't get it. So is he going to come here before he talks to Girard or after?

Coleman: After. From what, what I understood.

White: Yeah. I think she said before that call. I'm assuming that's the Larry call.

Coleman: Right.

White: So, why don't you give me a ring when you hear some life. The less I think we have to make up. Well, I think we need to call and get an idea...

Coleman: Of what's going on.

White: You know, I have a feeling that um, if, if we turn ourselves in prior to anything exploding it would make probably a big difference for us. We can probably negotiate something. If we wait until after then we might not be able to. I have no idea. But I think we should have a conversation.

Coleman: And we probably should. I, I do agree. But like I said, let's talk to Tom first.

White: Yeah.

Coleman: See what's going on. I just, once you you turn yourself in there's no turning around, turning back.

White: I know. I know, but having a conference call with a lawyer is not, you know.

Coleman: I just don't know if I trust him. But I agree.

White: They're not gonna, they, they don't have, they're not gonna have any evidence to do anything.

Coleman: Are you still planning on going to Zink next Friday?

White: Uh, I would like to.

Coleman: Leaving Friday morning?

White: I was gonna leave Thursday night.

Coleman: Oh Thursday evening?

White: Yeah (UI).

Coleman: You can't postpone it until Monday or Tuesday, or middle of next week? I'm just thinking if we have that Sabes audit.

White: (UI). We're never gonna, we're not gonna have the Sabes audit.

Coleman: Oh, they'll probably come back in. We, you know, they're not going to get a lot of the information they want. But, I'm just thinking if they do have it.

White: I mean, I don't know. What is going on on that Monday? Do we even know?

Coleman: Um nothing that I'm aware of. Right now anyway. I think Palm Beach is coming in to do an audit the end of next week. But Gottex is here on Thursday. Um Palm Beach might not come in until Monday. So maybe we can reschedule it until like the middle of next, I don't know how long. You need to get Wendy out of there though?

White: I need to do somethin, I mean. I've been dancing around not getting stuff done.

Coleman: Well I guess we'll just play it day by day. See what happens.

White: Yeah. I gotta schedule it up ahead. That's my problem.

Coleman: Right. No, I know. I realize that.

White: All right. Well I'll see you at this conversation.

Coleman: Okay, see you, Bob.

WHITE EX (3)

09/20/08 Track 1
1D32_0920_Track1

Deanna

Coleman: Calling Bob White back.

Bob

White: Hello.

Coleman: Hi, Bob. It's Deanna.

White: Hi. Hey, um. I've been re-thinking about a comment that Tom made uh when we were on the phone which was, I don't remember with those letters I don't remember whether I asked you to do it or whether, you know, you just did it on your own. I don't know if you remember that comment?

Coleman: Oh yeah, I remember it very well. He's been saying that a lot about everything, everything.

White: Yeah. Um, his defense, may stage that could defend this is, is really, um. He's going to say that Bob and Deanna were scrubbing the, the PO's and they're supposed to be looking at 'em, making sure that they were right. I had no idea they weren't true. And we're buying purchase orders from a variety of people like Fred Johnson and this and that. And he's gonna hang us out to dry.

Coleman: You know, I've kinda noticed that he, um, he watches what he says a lot, lot closer the last, um, two, three months.

White: He throws in little things like that. And Mike, ah, ah, Phillips, Phleeps, or Phillip.

Coleman: Michael Phelps?

White: Ah, he said, hey I don't know about, how. I don't understand these purchase orders that you guys are, you and Deanna are getting. Why aren't? How could they be at (UI) value? Or what, or what's happening with 'em I don't understand.

Coleman: Michael Phelps said that?

White: Yeah.

Coleman: Interesting. Well, I'm not gonna do any more, um, for Frank for rolling notes or for Greg Bell until Tom asks me to.

White: Yeah, but, I want to call an attorney. I mean I want. I'm, I'm, I'm, I'm, I want to (UI). Okay? I mean I don't wanna wait till the end of the (UI).

Coleman: No, I, well let's, let's talk Monday morning.

White: Okay. But I mean I, I, I def, I definitely want to, to do and to call and, and you know to get something understood. I think it's. I would. Listening to the financial crisis that's going on and everybody else worldwide. I don't. I think it's highly unlikely we're going to come up with any money. I think we're going down big time and the whole thing is shuffling our way.

Coleman: Well, I agree. That just, um, Tom's only hope right now is Girard.

White: He's talking to Girard now, is what you're saying?

Coleman: Well, yeah, he keeps.

White: I didn't understand what you said.

Coleman: Our only hope is Girard. He. Tom keeps telling me Girard is gonna give us...

White: Yeah.

Coleman: What, you know a hundred million or?

White: Yeah, but a hundred million is going to go like a spit on a hot fire.

Coleman: I.

White: All it does is buy us some time to pull off this deal that Tom has, he's saying Girard is buying a million, buying half of, of Polaroid in a fake deal for a million five and then he uses that to do a quick value on the company for other things. I, I, I and he's trying to, he wants to package it all up and, and, and wrap it all up and, Jesus, I don't know all the value of these things. That's, that's why I pay Bob and Deanna so much. They're supposed to be reviewing the

purchase orders and making sure they're right. You know I don't have. I haven't had anything to do with that thing for a long time. I just. You know and everybody can testify I don't really do anything with it. I'm working on this and this and this and it's not. You know I, I had no idea those guys were (UI) stuff like that.

Coleman: No, I agree. He uh, he watches what he says now, like I said. I think he's been talking to um, Fredrickson and Byron.

White: Yeah, absolutely and they're, and they're all coaching him as to well, how do you know whether they're good. He's saying well Bob and Deanna review the purchase orders. I don't do that. (UI) they're not good. (UI) maybe Bob and Greg are making up some of the purchase orders, I don't know. I don't understand. I'm trying to get to the bottom of it. No, it's, we're being set up. And uh, I don't feel, feel good, I definitely want to going to call a good attorney or something. Plus I think we should do it together.

Coleman: No, I definitely agree. Let's um talk about it next week or Monday or whatever and figure out who we should call.

White: Yeah, okay. Alright. I'll talk to you later, Deanna.

Coleman: Okay, bye.

White: Yep, bye.

Coleman: Call ended 9:49.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2010, I caused the following documents:

1. Supplement to Defendant White's Position on Sentencing and Exhibits.

to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following :

John T. Dixon III
John R. Marti
Timothy C. Rank

I further certify that I caused a copy of the foregoing documents and the notice of electronic filing to be mailed by first class mail, postage paid, to the following non-ECF participants:

N/A

Dated: August 4, 2010

s/ Joseph S. Friedberg
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