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## FTC EXHIBIT 8

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Case No. 03-C-3904

## **DECLARATION OF PETER WINK**

In accordance with 28 U.S.C. § 1746, I, Peter Wink, declare under penalty of perjury that the following is true and correct:

- (1) I am over eighteen years old and make this declaration based on my personal knowledge, including my personal interactions with Kevin Trudeau ("Trudeau").
- (2) In October, 2009, I began working with Trudeau on the marketing of *Your Wish Is Your Command*, a publication promoted by Natural Cures, which is a Trudeau-affiliated entity. Subsequently, in December, 2009, I also began working as the Director of Marketing for Global Information Network ("GIN"). In this capacity, I reported directly to Trudeau.
- (3) Among other things, I wrote email, internet and other GIN advertising copy under Trudeau's personal direction. I continued working for Trudeau until April, 2012, when I was terminated after I raised concerns regarding his business practices.
- (4) Several Trudeau-affiliated entities (including GIN, Natural Cures and Website Solutions USA) use the same office space at 130 Quail Ridge Drive, Westmont, Illinois. "Alliance Publishing Group" is the name on the office door. Alliance Publishing Group is another Trudeau-affiliated entity. KT Radio Network ("KTRN") and Trudeau Approved Products had offices across the street, but shared resources with the entities at 130 Quail Ridge.
- (5) During the time I worked as GIN's Director of Marketing, Michael Dow served as the Director of Finance and Accounting for the various Trudeau-affiliated entities, and he reported to Neil Sant.
- (6) I had an office at the Westmont location, as did Sant and Dow. Trudeau had an office at KTRN, but generally worked from his Oak Brook, Illinois home after he moved there in 2010. In addition to regular in-person meetings, Trudeau maintained constant contact with me regarding GIN through emails and text messages.
- (7) I met with Trudeau regularly at 130 Quail Ridge, at his office at KTRN, and at his residence located at 3108 White Oak Lane, Oak Brook, Illinois. At these meetings, Trudeau

gave me instructions regarding GIN projects and sales promotions. With respect to GIN, Trudeau made all of the key business decisions. Based on my experience as GIN's Director of Marketing, there is no question that Trudeau controls GIN.

- (8) Nataliya Babenko ("Babenko") had no role managing GIN or any other Trudeau-affiliated entity. To my knowledge, she never made any business decisions, nor did she attend any business meetings. For instance, in September, 2010, Trudeau convened a high-level GIN meeting in Germany to discuss new GIN projects and employment decisions. I attended along with other senior GIN employees. Babenko did not attend.
- (9) In fact, although I visited Trudeau at his Oak Brook home multiple times each month for over two years, I saw Babenko there fewer than ten times. I also met with Trudeau multiple times at his office located in the KTRN studio and in my office at 130 Quail Ridge, and Babenko was not present at any of these meetings. Babenko's name was never mentioned in any conversations dealing with any business-related topics. She was usually away at college (studying acting in New York) or at home in Ukraine.
- (10) In my visits to Trudeau's home, I saw his bedroom, his furniture, and other personal effects. Also, my wife helped Trudeau move into his home in 2010, and I dropped by and saw his personal belongings being moved into his home at that time. Based on my observations, it was apparent that Trudeau resided at the Oak Brook home.
- (11) Trudeau enjoyed an extravagant lifestyle, traveling on private jets, driving luxury vehicles, and receiving assistance from a staff including two personal chefs (David Leigh and Curtis Wozny) and a butler (Matthew Green).
- (12) In early 2012, at a GIN marketing meeting that Trudeau hosted at his home, I asked Trudeau for advice regarding investing in precious metals. Trudeau quickly retrieved a container of gold bars, and he showed the gold bars to me in his kitchen. Trudeau told me that he invested in gold. Trudeau also explained to me the different sizes and types of gold bars he was showing me, and he made two recommendations regarding where I could purchase gold.

Peter Wink

Executed on October 3, 2012 in AMMONI, Illinois.

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## FTC EXHIBIT 9

