

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

Case No. 08-CV-5348 (ADM/JSM)

UNITED STATES OF AMERICA,

Plaintiff,

**AFFIDAVIT OF
FREDERIC BRUNO**

v.

LARRY REYNOLDS,

Defendant,

DOUGLAS KELLEY,

Receiver.

COUNTY OF HENNEPIN)

) ss.

STATE OF MINNESOTA)

Frederic Bruno, being first duly sworn upon oath, states and alleges as follows:

1. I am the attorney for the Defendant above-named, Larry Reynolds.
2. I was hired by Mr. Reynolds to defend him in the *Petters* matter by written retainer agreement dated October 2, 2008.
3. In the days following my retention, I worked part or all of nearly every work-day hour in making swift, but grave, decisions concerning Mr. Reynolds' case, including all issues pertinent to the detention proceedings in federal court for the Central District of California, surrender to Minnesota, bail and bond, freezing of assets, as well as the overriding decision as to the advisability of reaching a plea agreement with the Government.
4. During this tumultuous period, which culminated in the change of plea hearing for Mr. Reynolds in Minnesota on October 23, 2008, I relied heavily on the assistance, advice, and legwork of Mr. Reynolds' California counsel, namely, Joseph Ryan and Stephanie Ames.
5. Every major decision made and step taken concerning Mr. Reynolds' criminal

and civil proceedings were made in lock-step with Mr. Ryan and Ms. Ames.

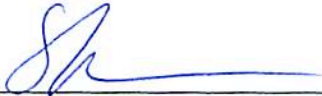
6. Without the efforts of these two attorneys, often working on weekends and well into the evening hours, I could not have done my job as efficiently. I also believe that the advice given and steps taken by both Mr. Ryan and Ms. Ames have assisted the United States Government in reaching an expedient and fair temporary resolution of all current matters in both the criminal and receivership proceedings.
7. For this reason, I respectfully request that attorney's fees incurred by Mr. Ryan and Ms. Ames be granted as reasonable and necessary expenses involved in both the criminal and civil proceedings.

Further, your affiant sayeth not.

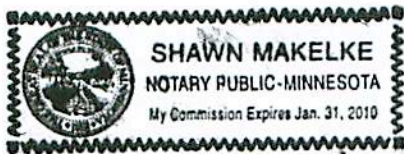


Frederic Bruno

Subscribed and sworn to before me
this 27 day of January, 2009.



Notary Public



NOTARY PUBLIC STATE OF MINNESOTA
SHAWN MAKELKE
My Commission Expires 01/01/2010

