

- Documents and sworn testimony linking Robert Printz, President of AVM and III-CM, to RICO-prohibited activities.

From: "Todd Wagner" <twagner@moslerauto.com>
To: "Robert Printz" <robert.printz@avmtd.com>
"Warren Mosler" <warren.mosler@gmail.com>

CC:

Date: 6/18/2008 12:55:39 PM

Subject: Photos of Rob's car at Homestead

Rob & Warren,

#28 car photos attached.

MOSLER
Todd Wagner
Director of Engineering
2391 Old Dixie Highway
Riviera Beach, FL 33404
Tel: (561) 845-3240
Fax: (561) 845-3237
Cell: (203) 668-3904
twagner@moslerauto.com



DEF002712



DEF002713

Warren Mosler depo #1 Feb. 10, 2016 pg 149 ln 5 - 9

5 Q. Did anyone else at AVM ever purchase a Mosler
6 vehicle?

7 A. They purchased one.

8 Q. A trader out of Boca.

9 A. Rob Prince bought one.

Warren Mosler depo #1 Feb. 10, 2016 pg 224 ln 5-12

6 Q. I have a quick question, and that is: Which
7 years did MACC obtain EPA Certificates of Conformity for
8 its MT900S vehicles?

9 A. I don't recall.

Warren Mosler depo #1 Feb. 10, 2016 pg 153 ln 10 - 20

10 Q. Within Exhibit No. 21, Mr. Wagner wrote, "As you
11 know, the 2004, 2009 cars were all built illegally with
12 lighter than certified flywheels and catalysts and all were
13 built after the certification certificate had expired. Yet
14 you are not persecuting the other Mosler owners."

15 Now, I want to just focus on the 2004, 2009 cars
16 produced by Mosler. Were they built with lighter than
17 certified flywheels in order to reduce the corresponding
18 weight ratio? Well, for any reason for that matter?

19 A. I mean, that's his allegation, but I don't have
20 any specific knowledge of that.

- MACC factory recall for severe fire risk was performed on **Rob Printz's vehicle**, but MOSLER refused to perform recall nor even answer questions about the severe-fire-risk to the 2012 Mosler RaptorGTR, which had the identical fire risk to the illegally-built 2004 Mosler MT900S and illegally-built 2009 Mosler MT900S vehicles.

Warren Mosler depo #1 Feb. 10, 2016 pg 168 ln 10 – pg 169 ln 15

10 Q. As you sit here today, can you tell me why MACC
11 would not have recalled -- excuse me. Let me back up.

12 As you sit here today, can you tell me why MACC
13 recalled other vehicles but not Mr. Wagner's slash SEI's
14 vehicle?

15 MR. REINBLATT: Objection.

16 BY MR. ZAPPOLO:

17 A. I don't recall any actual formal recall on
18 vehicles, but it's not impossible. But I just don't recall
19 recalling any in terms of --

20 Q. Other cars --

21 A. Again, I can be wrong.

22 Q. The problem with fuel lines coming loose was
23 fixed in other cars; correct?

24 A. Well, it says that here, but, you know, I wasn't
25 there, so it could have been fixed without anybody telling

Warren Mosler depo #1 Feb. 10, 2016 pg 168 ln 10 – pg 169 ln 15 (con't)

1 me. I don't know what the problem is --

2 Q. Did you authorize anyone at MACC to refuse to fix
3 the 2012 RaptorGTR fuel line problem on the SEI car?

4 MR. REINBLATT: Objection.

5 BY MR. ZAPPOLO:

6 A. I don't recall doing that without -- doing
7 anything without Alan's approval or anything of that
8 nature, to refuse anything.

9 Q. Once again I am going to ask, who was making the
10 decisions at Mosler?

11 A. Me.

12 Q. Okay. As you sit here today, do you know whether
13 or not the SEI car should have received a fix for its fuel
14 line?

15 A. I used to know and I forgot. I'd have to go back
16 with Alan and review the facts. But this is out of
17 context.

Trial Testimony, Warren Mosler testifying May, 2023 pg 872 ln 15 – 18

15 · · · · · Now, Exhibit Number 39, this was when **Mr. Alan**

16 · **Simon's car** -- about the time that it caught on fire,

17 · correct? · **Burnt to the ground?**

18 · · · A · Yeah.

Trial Testimony, Warren Mosler testifying May, 2023 pg 872 ln 24 – pg 873 ln 7

25 · · · Q · Okay · Now right after that, did you become

·1· aware of Mr. Wagner and Mr. Simon having a ***falling out***

·2· over whether or not Mr. Wagner would -- *over what*

·3· ***Mr. Wagner had said to an insurance adjuster about***

·4· ***Mr. Simon's car?***

·5· · · · A · You know, I don't remember the details, but I

·6· do remember they -- you know, they were having some --

·7· **it was confrontational.**

Trial Testimony, James Todd Wagner testifying May, 2023 pg 1175 ln 22 – pg 1176 ln 5

22 · · · Q · Okay · So how important was the EPA

23 · certification?

24 · · · · A · Without the EPA certification, that **company is**

25 · **100 percent worthless · It's actually worth less than**

·1· **the zero because the insurance fraud and liability**

·2· associated with that car was about \$220,000.

·3· · · · Q · For the record, you're indicating a picture of

·4· the burnt Alan Simon car?

·5· · · · A · Alan Simon car, yes.

Trial Testimony, James Todd Wagner testifying May, 2023 pg 1179 ln 3 - 10

·3· · · · · **When I didn't comply with the insurance**

·4· **pump-up request, they stripped me off of the website as**

·5· **a distributor.** Now all this --

·6· · · · Q · Now there are emails in evidence about that?

·7· . . . A· · Emails in evidence about that, so --
·8· . . . Q· · Emails about removing you from the website?
·9· . . . A· · They didn't tell me.· It was all done in
10· ·secret **behind my back.**

Trial Testimony, James Todd Wagner testifying May, 2023 pg 1627 ln 18 – 21

18· ·I offered him even more money, and he agreed to it, and
19· ·then he took all the assets out and **the only thing I**
20· ·**would know for sure I was buying is the liability from**
21· ·**his lawyer's insurance fraud.**

Trial Testimony, Warren Mosler testifying May, 2023 pg 2334 ln 17 – 23

17· . . . Q· · I'm showing you what's been marked as 633, now
18· ·119 in evidence.· As early -- you would agree with me
19· ·that as early as January 21, **2009**, you were copied with
20· ·***emails from Mike Vietro talking about cars catching on***
21· ·***fire***, could have caught fire, and potentially catching
22· ·on fire, and ***cars reeking of gas***, right?
23· . . . **A· · Yes.**

Trial Testimony, Warren Mosler testifying May, 2023 pg 2334 ln 5 – 7

5· . . . Q· · Okay.· **As early as 2009, cars were catching on**
·6· ·**fire**, weren't they?
·7· . . . A· · I don't remember the date it was.

Trial Testimony, Warren Mosler testifying May, 2023 pg 2332 ln 18 – pg 2334 ln 18

- 18· . . . Q· All right. One of the issues that came up
- 19· yesterday was a **discussion about fuel lines**. Do you
- 20· remember that -- or, excuse me, cars catching on fire.
- 21· Do you remember that?
- 22· . . . A· Yes, a little bit.
- 23· . . . Q· Okay. And you put in front of the jury
- 24· Exhibit 125, which is in evidence, right?
- 25· . . . A· Yeah.
- 1· . . . Q· And that's Savvas Savopoulos saying "sour
- 2· grapes" about James?
- 3· . . . A· Yeah.
- 4· . . . Q· **"I trust you can get him to go away,"** that was
- 5· Savvas Savopoulos again telling you **get James Todd**
- 6· **Wagner to go away, right?**
- 7· . . . A· That's what it says. **It is exactly what it**
- 8· **says.**

Trial Testimony, Hassan Abboud testifying May, 2023 pg 472 ln 24 – pg 475

- ln 3 24· . . . Q· Do you remember what -- well, let me ask you
- 25· this: Do you still have the car?
- 1· . . . A· **The Mosler?**
- 2· . . . Q· Yes.
- 3· . . . A· No. **It burned down.**

Trial Testimony, Hassan Abboud testifying May, 2023 pg 473 ln 9 - 14

9 · · · Q · Do you know what the ***cause of the fire*** was?

10 · · · A · I wasn't there. It was in Indianapolis -- or

11 · it was in Springfield, Illinois, I'm sorry, with a

12 · friend of mine and he was driving it and it caught on

13 · fire. Luckily him and his son was okay. I don't

14 · remember what was the cause of it, I wasn't there.

- Images of Hassan Abboud's illegally-built 2004 Mosler MT900S follows:



- Images of MOSLER's personal attorney Alan Simon's illegally-built 2004 Mosler MT900S (PL#7) that MOSLER instructed MACC to GIFT to Mr. Simon that was the focus of Alan Simon's Insurance Fraud and the **"Confrontation"** between Alan Simon and Plaintiff, James Todd Wagner upon Mr. Simon's attempt to involve Mr. Wagner in Mr. Simon's insurance fraud and "pump-up" to \$329,000 + options follows:



- Plaintiffs Exhibit #106, which Warren B. Mosler requested Judge Luis Delgado to declare was *“no evidence nor inference in a light most favorable to Plaintiffs”* follows:



James Todd Wagner <j.todd.wagner@gmail.com>

Return of \$100,000 Deposit

Warren Mosler <warren.mosler@gmail.com>
 To: James Todd Wagner <j.todd.wagner@gmail.com>
 Cc: Alan Richard Simon <alanrsimon@gmail.com>

Sun, Jun 24, 2012 at 5:17 PM

On Sun, Jun 24, 2012 at 5:02 PM, James Todd Wagner <j.todd.wagner@gmail.com> wrote:

Hi Warren,

I had the \$650,000 ready to go until Alan forced the issue on having his liability associated with his burned MT900s pushed onto the new owners of Mosler Auto Care Center. I had to disclose this information to the investor. I asked Alan to change his mind on this because it was diminishing the value of his employer's property (your company), but he refused.

Over to Alan for comment.

In my opinion, just after Alan's Mosler vehicle burned and Alan sent me numerous photos of his burned vehicle, Alan attempted to force me into committing insurance fraud on his behalf by elevating the value of his vehicle to the value of a 2009 car's list price because in his words (paraphrased), "It was built in 2009, so it should have the same value...and there aren't any replacements....and don't forget my options" The fact that Alan somehow got 100% of retail list price on his 2004 MY car that was built 4 years after the certification year, was 7 model-years old, and had 5800miles on it; makes me think that there were other things going on behind the scenes that led to the seemingly large payout on the car he paid \$11,000 for. I didn't do as Alan instructed, but simply mentioned to the adjuster the other recent transactions and auction prices that I felt were relevant. Both were less than the \$200,000 that Alan received. My punishment from Alan for my not getting him the \$329,000+options that it seems he was expecting was a verbal assault on the phone with him screaming at me saying, "I know it was you, because they said it was a distributor from Connecticut and you have a Connecticut phone number."

In my opinion, if Alan hadn't tried to lock-in his windfall profits on his burned car via shoving his potential liability onto your company you would have the \$650,000 today.

I demand the return the \$100,000 Deposit to James Wagner this week.

--

Sincerely,
 James Todd Wagner
 President
 Supercar Engineering, Inc.
 Wagner Supercars, Inc.

Confidentiality Notice: This document, including all intellectual property, data and attachments, is for the sole use of the intended recipient(s) and contains confidential and privileged information. If this email has come to you in error, please delete the email and alert the sender.

--

Warren B. Mosler
 Senior Economic Advisor to
 USVI Senate President Ronald Russell

> See you Tuesday. Enjoy!

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> Valance Co.

> 5000 Estate Southgate

> Christiansted, St Croix, USVI 00820

> office phone: 340 692 7710, Fax 7715

> Valance Co.

> 5000 Estate Southgate

> Christiansted, St Croix, USVI 00820

> office phone: 340 692 7710, Fax 7715

CERTIFICATE OF ORIGIN FOR A VEHICLE

MOSLER AUTOMOTIVE

DATE
10/25/2007

INVOICE NO.
2391006

VEHICLE IDENTIFICATION NO.
1M94136B34C682009

YEAR
2004

MAKE
MOSLER

BODY TYPE
CP

SHIPPING WEIGHT
2450

H.P. (S.A.E.)
435

G.V.W.R.
3004

NO. CYLS.
08

SERIES OR MODEL
MT900S

I, the undersigned authorized representative of the company, firm or corporation named below, hereby certify that the new vehicle described above is the property of the said company, firm or corporation and is transferred on the above date and under the Invoice Number indicated to the following distributor or dealer.

NAME OF DISTRIBUTOR, DEALER, ETC.

MOSLER MIKE MOTORSPORTS INC
1133 N TUSTIN AVE
ANAHEIM CA 92807

It is further certified that this was the first transfer of such new vehicle in ordinary trade and commerce.

* THIS VEHICLE *
* HAS A *
* CALIFORNIA *
* EMISSION *
* SYSTEM *

0000020

MOSLER AUTOMOTIVE

BY:



(SIGNATURE OF AUTHORIZED REPRESENTATIVE)

(AGENT)

RIVIERA BEACH, FL 33404

CITY-STATE

A B C D E F G H I J K L M N O P Q R S T U V W																			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	Build Date (if known)	Reference DEFs	Notes
2																			
3	1	M	9	4	1	3	6	B	9	4	C	6	8	2	0	1	8	Scott Ramsey	No airbags & Factory Supercharged
4	1	M	9	4	1	3	6	B	0	4	C	6	8	2	0	2	23	BullRun Car	
5	1	M	9	4	1	3	6	B	2	4	C	6	8	2	0	3	24	George Lucas	Factory Supercharged
6	1	M	9	4	1	3	6	B	4	4	C	6	8	2	0	4	22	Everett Ogilvie	
7	1	M	9	4	1	3	6	B	6	4	C	6	8	2	0	5	43	Paul Stu	Originally Joel Ball's vehicle
8	1	M	9	4	1	3	6	B	8	4	C	6	8	2	0	6	44	Russel Bird	
9	1	M	9	4	1	3	6	B	X	4	C	6	8	2	0	7	31	Randy Klaker	1352-1354, 1410
10	1	M	9	4	1	3	6	B	1	4	C	6	8	2	0	8	33	Ali Amazura	
11	1	M	9	4	1	3	6	B	3	4	C	6	8	2	0	9	19	Hassan Abboud	1264-1265, 1410
12	1	M	9	4	1	3	6	B	X	4	C	6	8	2	0	10	53	Bill Mazzoni	
13	1	M	9	4	1	3	6	B	1	4	C	6	8	2	0	11	52	Rob Printz	PL1422 1423, PL2728
14	1	M	9	4	1	3	6	B	3	4	C	6	8	2	0	12	34	Alan Simon	
15	1	M	9	4	1	3	6	B	5	4	C	6	8	2	0	13	38	Todd Beckman	397, 402, 9833
16	1	M	9	4	1	3	6	B	7	4	C	6	8	2	0	14	56	John Gocha	
17	1	M	9	4	1	3	6	B	9	4	C	6	8	2	0	15	54	Mike George	1410, Simon depo Exh 23 & pg 27
18	1	M	9	4	1	3	6	B	0	4	C	6	8	2	0	16	35	Lee Adams	
19	1	M	9	4	1	3	6	B	2	4	C	6	8	2	0	17	36	Scott Wilding	Beckman deferred to a '09 MT900
																		10197-10200	Became the '0500hp 'Landshark'
																		9961 - 9971, 1734	Factory Installed 820hp Engine
																		1734-1737, 1791	Factory Supercharged
																		1804-1814, 5784-5786	Factory Supercharged
																		1804-1814	Factory Supercharged

From: "Warren Mosler" <warren.mosler@gmail.com>
To: "Robert Printz" <robert.printz@avmtl.com>
CC:
Date: 12/5/2007 11:52:26 AM
Subject: Re: C52 car test drive with Rob Printz

good to hear it! keeps up with traffic ok?
:)

On 12/5/07, Robert Printz wrote:

> It is awesome.

> -----Original Message-----

> From: Warren Mosler [mailto:warren.mosler@gmail.com]

> Sent: Wednesday, December 05, 2007 8:20 AM

> To: Todd Wagner

> Subject: Re: C52 car test drive with Rob Printz

> Congrats- good to hear it!!!!

> On Dec 5, 2007 9:10 AM, Todd Wagner wrote:

> Rob & Warren,

> Rob's car is a real sweetheart. It's my personal favorite thus far
> and superlative in every way.

> It has the closer GT3 gearing in 1st-5th for performance and our

^
> Valance Co.
> 5000 Estate Southgate
> Christiansted, St. Croix, USVI 00820
> office phone: 340 692 7710, Fax 7715
^ ^

-
blog: www.mosler-economics.net

Valance Co.
5000 Estate Southgate
Christiansted, St. Croix, USVI 00820
office phone: 340 692 7710, Fax 7715

From: "Todd Wagner" <twagner@moslerauto.com>
To: "Robert Printz" <robert.printz@avmtd.com>
CC: "Warren Mosler" <warren.mosler@gmail.com>
Date: 11/30/2007 5:04:30 PM
Subject: Final MT900 interior photos

Hi Rob,

She's a beauty! Also, these are the most comfortable seats we've ever had in a MT. Lots of headroom, too.

See you Tuesday. Enjoy!

MOSLER

Todd Wagner
Director of Engineering
2391 Old Dixie Highway
Riviera Beach, FL 33404
Tel: (561) 842-2492
Fax: (561) 845-3237
Cell: (203) 666-3904
twagner@moslerauto.com



DEF000397



DEF000398



DEF000399



DEF000400

From: "Todd Wagner" <twagner@moslerauto.com>
To: "Robert Printz" <robert.printz@avmtd.com>
"Warren Mosler" <warren.mosler@gmail.com>

CC:

Date: 12/20/2007 4:52:31 PM

Subject: Printz car delivery photos

Final weight 2517lbs. Enjoy!



Todd Wagner
Director of Engineering
2391 Old Dixie Highway
Riviera Beach, FL 33404
Tel: (561) 842-2492
Fax: (561) 845-3237
Cell: (203) 608-3904
twagner@moslerauto.com



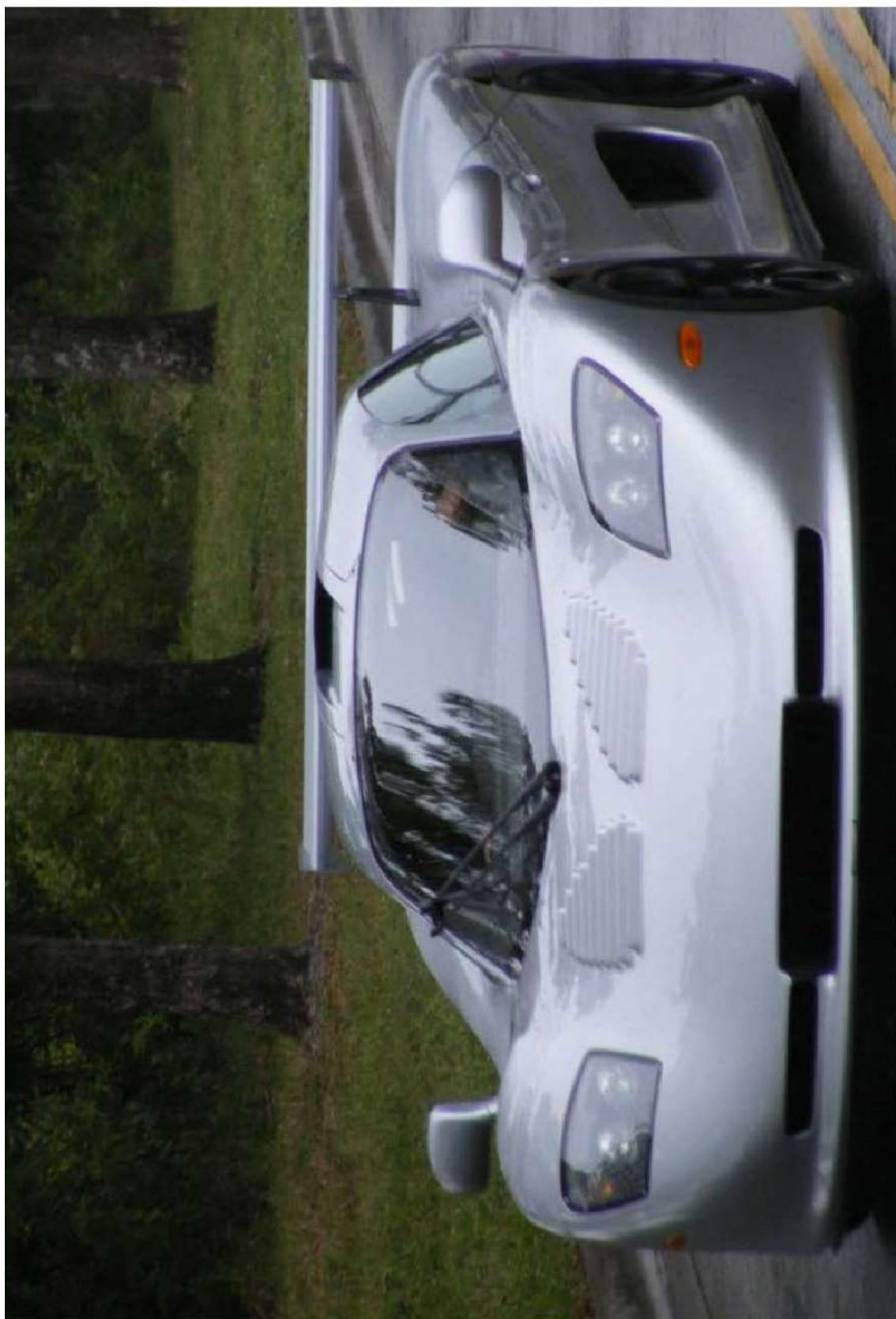
DEF000445



DEF000446



DEF000447





DEF000449

From: "Todd Wagner" <twagner@mail.moslerauto.com>

To: warren.mosler@gmail.com

CC:

Date: 7/10/2007 8:43:08 PM

Subject: Fw: Your Mosler MT900s

Hi Warren,

Jill and I had a very enjoyable dinner with Andreas this evening. I spoke with Rob about his car to get an idea of what his dream Mosler would look like. He wants an quiet, comfortable, cool, easy to drive MT that looks very much like the UTC car. I consolidated his wishes (see below) and noted what our typical option prices are. He wanted me to send this to you for review.

Cheers,

todd

-----Original Message-----

From: "Robert Printz" <robert.printz@avmild.com>

Sent: 7/10/2007 6:05:33 PM

To: "Todd Wagner" <twagner@moslerauto.com>

Subject: RE: Your Mosler MT900s

[That](#) looks good to me. [Thanks.](#)

[Please run by Warren for his opinion.](#)

From: Todd Wagner [<mailto:twagner@moslerauto.com>]

Sent: Tuesday, July 10, 2007 5:04 PM

To: Robert Printz

Subject: Your Mosler MT900s

Hi Rob,

Below is a synopsis of your options and other requests for the Silver MT900s. Please check for accuracy. Some cool photos attached including a couple with red calipers.

1) Quiet: I'll add extra Dynamat in the bulkheads and doors to keep the interior quiet: N/C

DEF001014

- 2) **Wider Spaced Pedals:** N/C
- 3) **Stock Engine with 26lb flywheel:** N/C
- 4) **Working A/C:** N/C
- 5) **Full Leather Package.** Gunmetal Grey leather seats & interior with red stitching. Bare carbon cupholder & inner door handles. 6' 1.5" driver height.: COST \$10,000
- 6) **Std Stereo with Subwoofer & 12-disc CD changer** mounted in trunk as far to one side as possible: COST \$1500
- 8) **Paint** just like Bullrun car (Viper Bright Metallic Silver) Wing silver, but with no "MOSLER" on top: N/C
- 9) **Black Center Dymags 19" 20":** COST \$1000
- 10) **5.25" ride height:** N/C
- 11) **Red brake calipers:** N/C

Total Vehicle Cost: \$189,900 + \$10,000 + \$1500 + \$1000 = **\$202,400** The \$1950 destination charge isn't applicable as you're picking it up locally.

Cheers!
Todd



From: "Warren Mosler" <warren.mosler@gmail.com>
To: "Todd Wagner" <twagner@mail.moslerauto.com>
CC:
Date: 7/10/2007 9:39:34 PM
Subject: Re: Fw: Your Mosler MT900s

very good. when the time comes work with Brian and Chet to get the higher ride height and still keep the lower a arms level.
also, knock off 25% for 'AVM discount' thanks.

warren

On 7/10/07, **Todd Wagner** <twagner@mail.moslerauto.com> wrote:

Hi Warren,

Jill and I had a very enjoyable dinner with Andreas this evening. I spoke with Rob about his car to get an idea of what his dream Mosler would look like. He wants an quiet, comfortable, cool, easy to drive MT that looks very much like the UTC car. I consolidated his wishes (see below) and noted what our typical option prices are. He wanted me to send this to you for review.

Cheers,

todd

-----Original Message-----

From: "Robert Printz" <robert.printz@avmltd.com>
Sent 7/10/2007 6:05:33 PM
To: "Todd Wagner" <twagner@mail.moslerauto.com>
Subject: RE: Your Mosler MT900s

That looks good to me. Thanks.

Please run by Warren for his opinion.

From: Todd Wagner [<mailto:twagner@mail.moslerauto.com>]

DEF001016

From: "Robert Prinz" <robert.prinz@avmitd.com>
To: "Todd Wagner" <twagner@moslerauto.com>
CC: "Warren Mosler" <warren.mosler@gmail.com>
Date: 10/4/2007 3:49:53 PM
Subject: RE: your MT900 update

WOW!!!!!! That looks spectacular. Thanks.

From: Todd Wagner [<mailto:twagner@moslerauto.com>]
Sent: Thursday, October 04, 2007 3:31 PM
To: Robert Prinz
Cc: 'Warren Mosler'
Subject: your MT900 update

Rob,

We converted your car to rubber engine mounts to help create the pleasant and quiet cabin per your request. You'll be surprised how the harsh, high frequency (noise) is kept out while the nice low-freq exhaust rumble come into the cabin in just the right volume.

Notice how perfectly the body panels fit! She's really beautiful.

todd



DEF000221

From: [Jill <jfwagner@moslerauto.com>](mailto:jill_sfwagner@moslerauto.com)
To: ["Mike Vietro" <mv@corvettemike.com>](mailto:Mike.Vietro@corvettemike.com)
CC: accounting@corvettemike.com
warren.mosler@gmail.com
["Alan Simon" <ars@simonandsimonlaw.com>](mailto:Alan.Simon@ars@simonandsimonlaw.com)
Date: 10/31/2007 3:42:29 PM
Subject: RE: Hassan's invoice, Ali and Beckman

ETA on emissions car is unknown. A very rough guess is January. We are building the '08 chassis in expectation of passing. The first US 2008 car will be done in Feb/Mar. There is nothing wrong with showing Paul's car at the show as long as it is clear that it is an aftermarket vehicle.

Thank you,
Jill Wagner
GM and VP of Global Operations
Mosler Automotive
Phone: 561-842-7829
Fax: 561-845-3237

-----Original Message-----

From: Mike Vietro [mailto:mv@corvettemike.com]
Sent: Wednesday, October 31, 2007 3:06 PM

To: Jill

Cc: accounting@corvettemike.com; warren.mosler@gmail.com; 'Alan Simon'
Subject: RE: Hassan's invoice, Ali and Beckman

Quoting Jill :

- > Mike,
- > I have accommodated no requests that have not been discussed by you or John.
- > The \$189,900 was negotiated by John H originally. The communication
- > breakdown is between yourself and John Hallenborg. This "extra work"
- > on the invoice was not done here - it was part of what came on this

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> car from England. There was nothing to discuss. At our cost we touched up the paint.

That's my point. The car came that way from the UK. And it was sold at a discount to move the car. The price point was not negotiated by John. Warren set the price. We would have to assume the same distributor discount applies.

Why would it be different? Warren can decide this one.

- > I never agreed to finance Ali's car - that was Warren's call. The
- > factory is not financing anything - just Warren. I have no say on this decision.
- > Per Alan Simon, Ali played significant games with financing causing
- > Warren to refuse financing.

And because of those games and the time it took to discover them we are now handling the financing for him. However he's been dragging his feet and just got the docs to Max this week.

- > Todd Beckman has never been asked by us to get further money since it
- > is your job to collect money. During our call yesterday you mentioned
- > you would ask Beckman for more money and now you are asking me to do it?

I am not asking you to do it. That's my job. I am referring to the fact that I was never told of any progress of his car. I found this out from Russ just the other day when I phoned him. Beckman has been very patient waiting for his car. But we need to know that he has the ability to perform and pay as per our addendum. I will contact him when I return from SEMA for the additional \$25,000.00.

Lastly since I am writing, I met with Paul Siu last night and gave him his special Mosler keys. He was very thankful. He and I are meeting Tom Nelson today for a progress report on his engine. My goal was to use his car at the LA Auto Show in November. Is this premature? The goal is to sell '08 LS7 cars. I need and educated guess on emissions testing and ETA. Should we even display there?

Who's call is this? Warren's, Alan's, Todd's or yours?

Thanks,
Mike Vietro

> Thank you,
> Jill Wagner
> GM and VP of Global Operations
> Mosler Automotive
> Phone: 561-842-7829
> Fax: 561-845-3237
>
> -----Original Message-----
> From: Mike Vietro [mailto:mv@corvettemike.com]
> Sent: Wednesday, October 31, 2007 12:46 PM
> To: Jill
> Cc: accounting@corvettemike.com; warren.mosler@gmail.com; 'Alan Simon'
> Subject: RE: Hassan's invoice, Ali and Beckman
>
> Jill,
>
> Here's the problem we are going to continue to face if we allow the
> customers to deal direct with the factory. You are accommodating
> requests from the clients and these items are not being discussed with me.
>
> As with Hassan he was offered a UK car because he wanted better
> pricing. So Warren allowed the price to be \$189,900 with the extras
> that the car came with from the UK. So you can't then add them to my side
> only.
>
> We were offered UK cars at \$150,000.00 plus extras agreed to in writing.
> Just to get them sold. Maybe you were not involved then. All of this
> extra work you did for Hassan was never discussed with me.

DEF009805

> Next we have Ali with all of his custom mods. Again all of this extra
> work done at his request and his financing was denied by the factory.
> Here's a clear example whereby the factory should be holding a
> non-refundable sum for all his unusual requests and expensive sound
> system. The deposits I hold are technically viewed by the State of
> California as refundable. All of these items are addressed in the new
> distributor agreement. We are waiting for approval from Don L Leasing
> as early as today to assist Ali with his balance due.

> Lastly we have Todd Beckman, in speaking with Russ he tells me that
> Todd has been to see the car and loves the work but again no
> communication to me about getting additional monies for his paint job.
> I only have \$10,000 deposit from him still on the Bullrun car.

> As the distributor I must be the one who directs the build out of the
> cars and keeps the communication at a minimum from the end user to the
> production floor.
> Again all of these items have been addressed in the new agreement and
> approved by Warren.

> Sincerely,
> Mike Vistro

> Quoting Jill :
> > Mike,
> >
> > I think I can help with your confusion. John H and Warren agreed to
> > offer Hassan this car at a discounted price of \$189,900. As with
> > all of our cars, you pay a wholesale price based on the actual
> > vehicle price - which in this case is \$205,300. The 19% you
> > receive is based on this number (in other words you pay 81% of car
> > price). Therefore 81%
> > of \$205,300 is \$166,293.
> > Since the car was sold for \$189,900 and money received is \$166,293,

DEF009806

> > your commission is the difference (\$23,607). This is how we have
> > always calculated cost, just in this case the car was discounted by
> > John and Warren. You have the freedom to discount cars as you need,
> > but it affects your commission. Call me if this is unclear.
> >
> > Beth's invoice is correct, just needed an explanation.
> >
> > Thank you,
> > Jill Wagner
> > GM and VP of Global Operations
> > Mosler Automotive
> > Phone: 561-842-7829
> > Fax: 561-845-3237
> > -----Original Message-----
> > From: Mike Vietro [mailto:mv@corvettemike.com]
> > Sent: Tuesday, October 30, 2007 9:11 PM
> > To: Jill
> > Cc: accounting@corvettemike.com
> > Subject: Hassan's invoice
> >
> > Jill,
> >
> > Something is clearly wrong with this pricing. When Warren agreed to
> > discount this car to us for Hassan it was because it was a poorly
> > constructed UK car.
> >
> > It was offered to Hassan by JCH at Warren's pricing. He OK'd it.
> >
> > I will find out more from JCH and get the email for you. Remember
> > the goal was to sell off as many UK cars as possible. This was one
> > of them. I will find out more and get back to you.
> >
> > Mike Vietro
> >
> > Quoting Jill :
> >

DEF009807

Michael Vietro
Michael Vietro
Michael Vietro

- Documents and sworn testimony linking Thomas Olafsson, Principal of AVM, to RICO-prohibited activities.

Warren Mosler Trial Testimony pg 753 ln 14 – 23

14 · · · · Q · Now, Mr. Mosler, **who is Thomas Olofsson?**

15 · · · · A · He worked for me for my company at AVM.

16 · · · · Q · Okay · AVM is what?

17 · · · · A · It's a securities dealer.

18 · · · · Q · Okay · So you were forward -- and this

19 · document says "regarding Mosler Photon in automobile

20 · magazine." · That was referring to Exhibit 53 that is in

21 · evidence now, correct?

22 · · · · A · Yeah · That means there's a prior email

23 · somewhere.

Warren Mosler Trial Testimony pg 755 ln 9 - 25

·9 · · · · Q · Okay · So here we have -- on May 6th you wrote

10 · and you attached this article, correct?

11 · · · · A · Yeah.

12 · · · · Q · Okay · And then **Mr. Olofsson** wrote back -- you

13 · wrote to him at 7:33 attaching the article · At

14 · 9:12 a.m. he wrote back "Do you have one for me."

15 · · · · A · Right.

16 · · · · Q · Okay · Indicating that he wanted to buy it,

17· ·right?

18· · · · **A· · No· · I was going to give it to him.**

19· · · · Q· · Oh, okay.

20· · · · A· · He wasn't buying it.

21· · · · Q· · Oh, okay· Just like you had given one to Alan

22· · Simon?

23· · · · A· · Yeah.

24· · · · Q· · Did you give one to Ms. Klaker's husband?

25· · · · A· · Randy, yeah.

Warren Mosler Trial Testimony pg 757 ln 6 - 17

·6· · · · Q· · -- "The only Photon is the one in the UK· You

·7· · can have it after it runs on Top Gear if you want."

·8· · What is Top Gear?

·9· · · · A· · It was a car show or something in the UK.

10· · · · Q· · Okay· "Or we can make a new one in Florida

11· · which will take the rest of the year" --

12· · · · A· · Yeah.

13· · · · Q· · -- "or would you want a preowned one that

14· · could be rebuilt to your specs as desired"?

15· · · · A· · Yeah.

16· · · · Q· · Now, do you know whatever came of that?

17· · · · A· · He **took** a standard MT900 base model.

- Image of Mosler Chassis #038 (shown below), was on the list of items to be purchased via James Todd Wagner's \$100,000 deposit. Document confirming that Chassis #038 was to be purchased by Plaintiff on June 27, 2011 (2-days before JAMES wired the \$100,000 deposit) is Defendants' Production DEF8837-8867.
- Shortly after JAMES wired \$100,000 direct to MOSLER as a deposit on 3 finished Mosler products, one of which was Chassis #038, MOSLER commanded that Chassis #038 must be **secretly gifted to Thomas Olafsson**, principal of AVM.



- For brevity, two key pages of DEF8837-8867 follows:

From: "J. Todd Wagner" <j.todd.wagner@gmail.com>
To: "Warren Mosler" <warren.mosler@gmail.com>
"Lew Lee" <hdtv_1@mac.com>
"Bradley Odegard" <brad.odegard.nm@gmail.com>
"Jim Hurley" <james.hurley@salelease.net>
CC: "Robyn Hankins" <rsh@hankinsator.com>
"Jill Wagner" <jwagner@moslerauto.com>
Date: 6/27/2011 6:56:06 PM
Subject: \$100,000 deposit for the purchase of Mosler Automotive assets

Hi Warren & Lew,

Lew Lee and I have successfully arranged the financing to purchase Mosler Automotive per the signed Asset Purchase Agreement dated 4-17-2011. Per agreement, we will wire \$100,000 in to the Mosler Automotive account tomorrow (Tues). Please provide wire transfer instructions so that the funds can be wired expeditiously.

Per agreement, this deposit entitles Mosler Supercars, Inc. (MSI) 3-months of exclusivity within which the deal must be closed. Per agreement this \$100,000 is only refundable in the event Mosler Automotive / Mosler Automotive Assets are sold to another party after the 3-month exclusivity period ends.

We look forward to closing this deal promptly.

Sincerely yours,
J. Todd Wagner
Mosler Supercars, Inc.
Santa Fe Digital Media

DEF008836

Schedule 2.2a: Personal Property

MACC Site Equipment

All equipment, furniture, fixtures and other items of tangible property of Sellers, used or useful in the operation of MACC's business, and located as of the date hereof at the sites of MACC/Consulier's business, including without limitation: all MACC completed vehicles, partially completed vehicles, and parts in inventory, all design and manufacturing intellectual property for the Mosler MT900s, MT900GTR, Raptor, and RaptorGTR street cars; and the Mosler MT900R and Mosler SuperGT race cars in all of its various derivations, prior and current, all intellectual property, trademarks, trade names, trade usages, press coverage, good will and intangible items of any sort that belong to or derive from the Mosler brand name, the exclusive right to use the Mosler brand name, all tooling, jigs, molds, etc. required to produce MT900s, MT900GTR, Raptor, RaptorGTR, MT900R, and SuperGT vehicles, all tooling, jigs, molds, etc. required to produce Consulier street and race cars, all finished unsold MT900s, MT900GTR, Raptor, RaptorGTR, MT900R, and SuperGT vehicles in stock in both the USA Mosler facility and the UK Mosler facility, all partially completed MT900s, MT900GTR, Raptor, RaptorGTR, MT900R, and SuperGT vehicles in inventory, all accounts receivable due and owing on the date of Closing, or received between May 1, 2011 and the date of closing unless such accounts receivable have been expressly deducted from the Purchase Price. An inventory of the major assets is attached to this Schedule 2.2a, but the assets being purchased in this Agreement is not limited to this attachment.

MACC Completed Vehicles

- 1) Used 2004 MT900s Chassis# 008, Black, VIN: 1M94136B94C682001; 10,000 miles
- 2) Used 2004 MT900s Chassis# 038, Silver, VIN: 1M94136B54C682013; unknown miles
- 3) Used Consulier Series II, Blue, VIN: 43CSA1129LRC1C045; 48,000 miles
- 4) Used Consulier Race Car #6, White Hammerhead
- 5) Used Intruder Hardtop Race Car, Yellow
- 6) Used Raptor Race Car, Yellow
- 7) Nearly New SuperGT tube frame race car, Blue

MACC Partially Completed Vehicles

- 1) SuperGT tube frame race car
- 2) Five of Unpainted Mosler Chassis: 57, 62, 69, 70, and 71
- 3) MACC Ownership stake in C30, Nurburgring Record Attempt car

MACC Components for MT900s, Raptor, MT900R, SuperGT and Consulier Vehicles

- 1) All MT900, Raptor and Consulier components within the facility located at 2391 Old Dixie Highway, Riviera Beach, FL 33404.
- 2) All MT900, Raptor, and Consulier components within the MACC-rented storage facility located on 13th Street, Riviera Beach, FL, 33404.
- 3) All MT900R and SuperGT components located within the Mosler Europe facility located at Hilltop House, Somersham Road, St. Ives, Cambridgeshire, UK PE273LY.

From: "Warren Mosler" <warren.mosler@gmail.com>
To: "Todd Beckman" <todd@thetanco.com>
CC:
Date: 12/21/2007 4:15:36 PM
Subject: Re: Todd Beckman Mosler Customer

Hi Todd, good to hear from you, and good to see your car is coming along nicely!

I'm living in St. Croix and not directly involved, so I don't know what's been going on. The reason I made the 'rule' that all buyers talk only to Mike is for exactly the reasons below- communications seem to get all fouled up otherwise.

Mike likewise works everything through Alan Simon in Florida rather than Todd Wagner, for the same reasons, and that's worked out very well.

At this point I'm not sure what to do regarding the lines of communications as you've already been talking to Todd Wagner. I'm thinking it best for you to talk to Mike Vietro and Alan Simon on the same call, to make sure Mike has been relaying exactly what your concerns are to the factory?

If this makes sense to you, let me know.

Thanks!
Warren

On 12/21/07, Todd Beckman wrote:

>
>
>
> Mr. Mosler;
>

DEF000452

> It has been a long time since we have communicated. I hope you are doing
> well and that business is booming. The car has come along way from the
> first time I saw it as a "Bull Run" car to the version that stands today.
> And I am very excited about getting my car. I started this process in April
> 2005, when I made the very first deposit toward the MT900.

> My reason for this email is my concerns about my car. I recently received
> an email from Alan Simon stating that all correspondence needs to be
> directed thru the dealer in which I am purchasing my car through. I
> understand the business reasoning behind this, but I feel that Todd Wagner
> and I have had such good communication about my car up to this point that I
> hate to loose the momentum.

> Here are the concerns I have at this point. First of all, I am concerned
> about the difference of \$6,000 for the paint for my car. I would not have a
> problem with this cost; however, I was not told that I would have this extra
> expense because I am "a picky customer". I just feel that perfection is the
> only way it should be.

> Secondly, I want to know that the car I receive is what we have agreed on.
> I had spoken with Todd Wagner about swapping my engine to the new LS7 Dry
> Sump Engine for a \$14,000 difference. It concerns me that I have not been
> able to get an answer about the engine change. Mike Vietro and I are having
> a hard time, getting this resolved. I do have an email from Todd Wagner
> stating that the engine swap will be \$14,000 difference, but with all the
> changes in communication being made, I just want to make sure that this will
> actually take place.

- > > I am to the point that I need to give my second deposit to Mike so that the
- > > car can be completed, but I don't want to do this until I have confirmation
- > > that the engine swap will take place. I also understand that the engine
- > > swap will be done by an outside source, whom I will pay directly.

> I completely understand the restructuring of the company to make the process
> smoother for the customer and that changes/information gets documented
> properly. I just want to make sure that the car I receive is the one that I
> ordered.

> I would appreciate it if you could address my concerns so that we can move forward and get my car completed. I feel that you and I are the same type of person. We go by the motto of: Your hand shake and your word is all you have. And to show my commitment to your automobile I am in the process of placing an order with Mike for a 2008 model as well.

> Sincerely,

> Todd Beckman

- Documents and sworn testimony linking Michael Reger, Principal of III-CM, to RICO-prohibited activities.

Warren Mosler depo #1 Feb. 10, 2016 pg 220 ln 21 – pg 221 ln 1

21 Q. The RaptorGTR, there was only one of them;
22 correct? Right?

23 A. I don't know.

24 Q. You don't know?

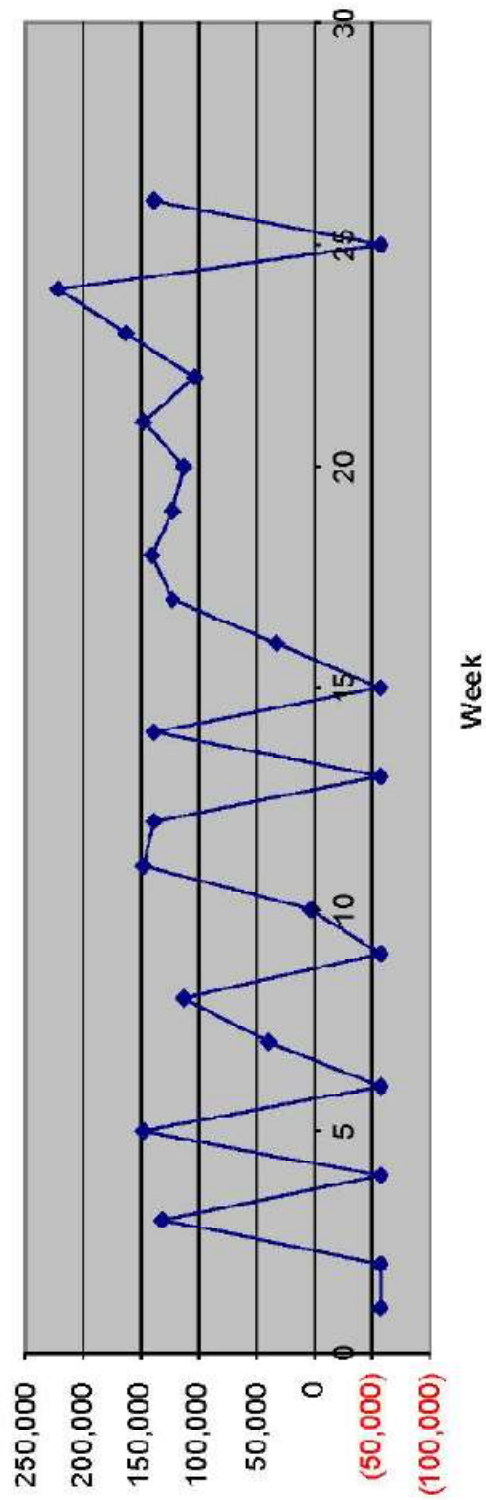
25 A. I know there were other twin turbo MT900s,
1 whether they were called RaptorGTRs or not, I don't recall.

	A	B	C	D	E	F	G	H	I	J	K	L	M
53													
54	NOTE: White German car (C49) being held without being paid for until approx week 45, when MACC will receive \$190,000.												
55	NOTE 2: Blue Breck car reserved for USA crash test												
56	NOTE 3: This model presumes cash from sale of currently unsold cars in Europe results in cash to the USA factory.												
57	FINAL NOTE: The pipeline will be nearly empty after all of these cars are sold, thus if certification is achieved there will be												
58	a significant lead-time buildup until additional cars are available for sale.												
59													
60	This will be the first car sold at the new price of \$329,000												

Analysis and Plan

DEF001814

Weekly Cash Flow



Sheet2

DEF001815

From: "Warren Mosler" <warren.mosler@gmail.com>
To: "Todd Wagner" <twagner@moslerauto.com>
CC: Jill <jwagner@moslerauto.com>
Date: 10/4/2007 10:09:16 AM
Subject: Re: 2008 cars production, painting and allocation

sounds good, you can ask Mike but I doubt he has the \$ to invest. maybe his dealers do, however, so you could ask him to check with them

On 10/4/07, **Todd Wagner** <twagner@moslerauto.com> wrote:
Warren & Jill,

Currently there are 6 of the 2008 cars out at paint:

- 1) Chassis 48: Mike Reger's twinturbo – at fantastic finishes; will be back here in approx 2 months as there are two '04 cars ahead of his
- 2) Chassis 49: Christof's twinturbo – due back here next Tuesday sans bumper (bumper due here in 2-3 weeks then will be fitted/painted)
- 3) Chassis 58: Unsold and in need of a paint code in 3 weeks.
- 4) Chassis 59: Unsold and in need of a paint code in 4 weeks.
- 5) Chassis 60: Christof's BMW dealer customer

2 more chassis are going out to paint in the next 2-3 weeks:

- 1) Chassis 61: Christof's 3rd '08 customer, who wants LOTS of bare carbon showing on body.
- 2) Chassis 62: FULL bare carbon body car. All of the carbon on this body is show-quality out of the mold (takes our supplier more time to do it this way).

US '08 cert timeline is difficult to gage, but is likely to take at least 3 more months. I'm expecting emissions data from our latest round of revisions (new injectors and cats) in a few days.

DEF000219

Perhaps Vietro would want to buy either 58 or 59 for a west-coast show car? One of these cars would be done in about 3 months, and would thus be on-the-ground ready for customers to evaluate.

Chassis 62 would make a spectacular factory show car, maybe all bare carbon with two Ferrari Fly Yellow racing stripes running over the whole car?

Thoughts?

MOSLER

Todd Wagner

Director of Engineering
2391 Old Dixie Highway
Riviera Beach, FL 33404
Tel: (561) 842-2492
Fax: (561) 845-3237
Cell: (203) 668-3904
twagner@moslerauto.com

Valance Co.
5000 Estate Southgate
Christiansted, St. Croix, USVI 00820
office phone: 340 692 7710, Fax 7715

DEF000220

From: "Todd Wagner" <twagner@moslerauto.com>
To: "Mike Reger" <mregger@avmltd.com>
"Warren Mosler" <warren.mosler@gmail.com>
"Jill Wagner" <jwagner@moslerauto.com>
CC:
Date: 2/5/2009 4:28:44 PM
Subject: RE: MT900

A couple photos of your machine attached...in case you need a new screensaver at AVM.

From: Mike Reger [<mailto:mregger@avmltd.com>]
Sent: Wednesday, February 04, 2009 6:58 PM
To: Warren Mosler; Todd Wagner
Subject: MT900

WOW!!!

Michael Reger
mregger@avmltd.com
(w) (561) 544-4600
(m) 561-252-0092

DEF003205



DEF003206



DEF003207



DEF003208



DEF003209