

broker, as relates to OE Capital was Mr. Charles Heinzelman, IV, of C4 Benefits Group in Austin, Texas. I learned about OE Capital Partners from Mr. Heinzelman, who presented this investment product to his agents to offer qualified clients. I, as a service provider under him, presented these investment opportunities to our clients.

I began presenting these investment opportunities in 2015. Many of our clients were looking for a non-index related investment. The O/E Capital model was believed to be a relatively safe and non-index investment vehicle. The information I presented to clients came directly from Mr. Heinzelman and O/E Capital Partners. I believe that Mr. Heinzelman invested money from his family members into the O/E Capital Partner's products.

I was informed that the structure of this investment was a non-index related venture capital product. O/E would loan the venture capital to companies which met O/E's standard of qualification. I was informed these were not start up companies but companies which had already achieved a degree of success. O/E's vehicle was attractive to many investors due to the fact that O/E assisted the companies by integrating an experienced management team into the oversight of the business development, maximizing the opportunity for success.

To this date, I believe in the soundness of this investment vehicle. So much so, I liquidated my Individual Retirement Account and invested \$96,182.12 into O/E Capital Partners, L.L.C. I do not believe this is a ponzi scheme and it is evident the money from investors went into real companies, such as WHRZT and Unequal, as venture capital. These are companies, which to my knowledge, are being negotiated with as of today by the Receiver. I would not have liquidated my retirement account and knowingly invested in something which was a ponzi/pyramid scheme. While I was never privy to the day to day operations of O/E Capital, I believed and continue to believe in the soundness of this investment.

I have always communicated effectively and forthrightly with my clients and will continue to do so. To my knowledge, I have remained integrous and truthful, and at no time have I purposefully misled investors concerning any investments or products I have presented to them.

RESPONSE TO RECEIVER'S ALLEGATIONS OF CONTEMPTUOUS CONDUCT

I have never taken any action which was meant to..."hinder, obstruct, or otherwise interfere with the Receiver". In reference to the April 7, 2017 email (Dkt. No. 57, at 23), I do not believe that anything in the email is false or fictitious. My understanding is that the information in the email came from Patrick Howard, Dovile Soblinskas, Ron Scherer and other unknown investors. I do not have any knowledge that the information contained in the email is false to any degree. I did help Ms. Soblinskas edit and grammatically correct the email. As for the content, I had nothing to do with originating the facts presented. I was not a composer of the factual content of the email.

I did authorize my name to be included as an investor on the email, as I am an investor and I was no longer employee of O/E Capital Partners. I had no knowledge that Ms. Soblinskas' name was not going to be included in the email as an investor. I did not see the final version of the email before it was sent. I did state to the Receiver that I was concerned about my reputation at the March 21st meeting. My reputation is important to me, as it is to everyone. During this meeting with the Receiver, Mr. Stokely stated to me that 5¢ on-the-dollar was an optimal return for circumstances such as this. He even went so far as to say that a 5% return was "above-average." When I heard that, I was shocked, as I knew these investments were real and could yield much higher returns than Mr. Stokely believed was a good return.

I believe that I was on the conference calls referred to in Exhibit "B". I remember being on two of the conference calls. Investors were asking questions and we were all discussing the issues presented by the SEC and the Receivership. To the best of my knowledge, there was nothing false or fictitious stated by anyone, let alone me.

The emails contained as Exhibits "D and E" in Receiver's Omnibus Response to Howard's Horne's and Scherer's Responses to Court's Show Cause Order (Dkt. No. 81) ["Omnibus"] were sent by me. I do not see how these emails are "harassing or interfering" with the Receiver. To my knowledge, at the time these emails were sent, the Receiver had not contacted ANY of the investors and the investors were contacting me and asking questions. Out of respect for my clients, when asked, I gave them the information about who the Receiver was and relayed information I was told by the O/E principals. However, the email "Exhibit D" was not sent to any investors, it was sent to Patrick Howard. The reason for this email was to confirm I was stating things correctly.

The email labeled Exhibit "E"- in Omnibus was sent to Jim and Jan Fite. It was not sent to any investors. Even if it was sent to any investors, there is nothing false or fictitious in the email and it was not written to "harass or interfere" with the Receiver. The allegation that the reason for Horne sending this email to "...get ahead of the Receiver's communication to investors." (Omnibus p.14) is spurious and the only reason the Receiver is saying this is due to the fact that he HAD NOT YET communicated with the investors that were calling HORNE, at times a month after he became the Receiver. Attached as Exhibit "B" to this Supplemental Response is a print out of an email I received from an investor, Mr. Ron Miers, on February 23, 2017. This email was then forwarded to Patrick Howard. This is important to show that the Receiver had not yet reached out to an investor that was contacting me directly.

Also, I have attached as Exhibit “C” an email string from an investor, Danny Smith. This is important due to the content of the email dated March 1, 2017, wherein Mr. Smith is trying to get executed contracts from Ms. Horne. This is important to note, because Mr. Smith was an investor prior to the February 14th, 2017 date, which is the date the Receiver executed the shut down of O/E Capital. **More than two weeks after the Receiver acted and shut down O/E Capital, an investor still had not heard from Mr. Stokely.**

On April 3, 2017, I received an email from Ms. Dovile Soblinskas. I have attached this email as Exhibit “D”. The email was sent to me, “as is”. Ms. Soblinskas wanted me to help edit an email to the investors. I understood she was responsible for the content of this email and I was to help edit, organize and correct the email for grammar and readability. As I am not a principal, I am not privy to the facts being true or false, but took the statements as true because the statements were coming from Ms. Soblinskas, as she was a day to day manager of O/E Capital.

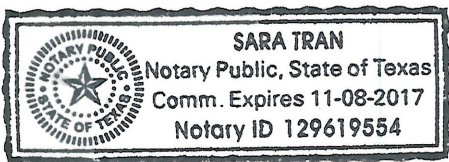
I believe this investment was not and is not now a Ponzi scheme. These were real investments in companies that were seeking venture capital and expertise in managing their businesses.


BEFORE ME,

the undersigned authority, on this the 12th day of June, 2017, personally appeared CHRISTINE A. HORNE, who, after being by me duly sworn, stated: I am the above named affiant. I have read the forgoing affidavit and swear that all of the above statement of facts is true and correct.


CHRISTINE A. HORNE

SUBSCRIBED AND SWORN TO before me this the 12th day of June, 2017.




Notary Public In and For
The State of Texas