

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
PADUCAH DIVISION**

DAVID GRIFFIN,

Plaintiff,

v.

**CHARLES A. JONES; SARAH C. JONES;
CA JONES MANAGEMENT
GROUP, LLC; INTEGRATED
COMPUTER SOLUTIONS, INC.;
BLACKROCK INVESTMENTS, LLC;
SE BOOK COMPANY, LLC; and
COLLEGE BOOK RENTAL COMPANY,
LLC,**

Defendants.

**Case No. 5:12-cv-00033
JUDGE RUSSELL**

JURY DEMAND

AFFIDAVIT OF DENICE MORGAN

STATE OF ARKANSAS

COUNTY OF PHILLIPS

Denice Morgan, having been duly sworn, states as follows:

1. My name is Denice Morgan.
2. I am over the age of eighteen and am otherwise qualified to offer the following testimony, which is based upon my own personal knowledge.
3. During all relevant periods, I have been employed as an office manager for First Delta Financial or DBG Enterprises, businesses owned by David Griffin. In my capacity as office manager, I am familiar and knowledgeable of the business affairs, and books and records and operations of David Griffin's companies and expenditures and investments made by David Griffin, including the matters to which I am testifying to herein.

4. Beginning in 2008, I oversaw dozens of transactions, as approved by David Griffin, whereby Griffin invested funds in several entities in which he held an ownership interest along with Charles Jones, including Integrated Computer Solutions, Inc., Blackrock Investments, LLC, SE Book Company, LLC, and College Book Rental Company, LLC (together, the "Companies").

5. I have reviewed the ledger reports which document investments made by David Griffin to the various Charles Jones-related companies. To the best of my knowledge, those ledgers represent an accurate recording of the financial dealings between David Griffin and Charles Jones.

6. The ledgers contain hundreds of entries from 2008 to the present.

7. When faced with an operational shortfalls, Charles Jones or his employees related to the Companies routinely called or emailed to request additional investments to cover those expenses.

8. When money would be sent to cover operational expense shortfalls, that money initially went directly to SE Book Company, LLC, with the understanding that these funds might be used by either SE Book or College Book Rental.

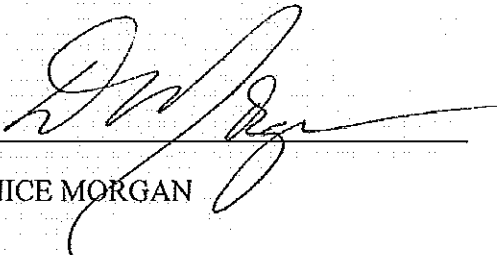
9. Between June 2008 and February 2009, David Griffin loaned approximately \$1 million to SE Book.

10. Through December 31, 2010, David Griffin had invested at least \$20 million in the Companies.

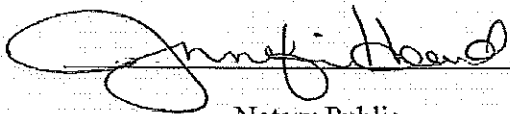
11. Griffin invested another approximately \$9,353,000 during the first six months of 2011.

12. Based upon the records maintained by Mr. Griffin's employees, CBR and SEB have collectively received approximately \$28 million in net transfers.

FURTHER THE AFFIANT SAITH NOT.


DENICE MORGAN

Sworn to and subscribed before me on
this the 28th day of February, 2012.


Notary Public

My Commission Expires: 03/18/19

