

Old Glory Holding Company

3401 NW 63rd St.

Suite 600

Oklahoma City, OK 73116

June 24, 2024

Via Electronic Mail Only

Mr. Christopher W. Timmons, Esq.
Georgia Bar No: 712659
Knowles Gallant Timmons
6400 Powers Ferry Road,
Suite 350
Atlanta, Georgia 30339
E-Mail: ctimmons@knowlesgallant.com

Mr. Ryan Downton, Esq.
Pro Hac Vice
The Texas Trial Group, P.C.
875 Carr 693, Ste. 103
Dorado, PR 00646
Email: ryan@thetexastrialgroup.com

Re: *WPI COLLATERAL MANAGEMENT, LLC, et al vs. VIVEKRAMASWAMY, et al. – U.S. District Court, N.D. Ga., Case No. 1:24-cv-02148-ELR*

Dear Mr. Timmons and Mr. Downton:

We reference the above titled action (the “Action”), described in your Complaint (the “Complaint”), which names Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (collectively, the “Old Glory Entities”) as Defendants.

Also, we note the Order for Temporary Injunction restraining your clients in this Action, issued by the United States Bankruptcy Court for the Northern District of Texas, Dallas Division on June 18, 2024 (the “TRO”), *Scott M. Seidel, Trustee v. Toby Neugebauer, et al.*, Adversary No. 24-03038, which is related to the main case *In re With Purpose, Inc.*, Case No. 23-30246-mvl.7.

Although such TRO temporarily restrains your clients from any further prosecution under this Action, this letter is to inform you that when/if such TRO is lifted, we hereby demand that you within 21 days of being permitted to do so, dismiss the Old Glory Entities from this Action because you do not have a single item of evidentiary support to meet your burden under Rule 11 of the Federal Rules of Civil Procedure in connection with you signing and filing this federal Complaint. Furthermore, you have no evidence to support that any of the Old Glory Entities (or their founders) were involved in any of the transactions relating to Glorifi.

We are also sending a copy of this letter to the Chapter 7 Trustee, Scott M. Seidel, who is the Plaintiff in such TRO.

None of the factual contentions in your Complaint relating to the claims against the Old Glory Entities have ANY evidentiary support and will not lead to evidentiary support. You know this to be true because of the following (without limitation):

1. Contrary to your assertions in the Complaint you signed, you do not have in your possession a single document, email, or other item of evidentiary support (including verbal statements) that suggests that Glorifi (or any Defendant) and the Old Glory Entities ever had a single discussion or agreement about ANY transaction in 2020, 2021, or 2022.

2. Contrary to your assertions in the Complaint you signed, you do not have in your possession a single document, email, or other item of evidentiary support (including verbal statements) that suggests that Mr. Nick Ayers was ever involved in or had any discussions with any of the Old Glory Entities (or their employees, officers, or agents) in 2020, 2021, or 2022.
3. As part of your work as a lawyer in preparing and filing this Complaint, you were obligated to review public filings to obtain evidentiary support relating to your clients' factual assertions and, thus, you know that (i) the domain www.OldGloryBank.com was purchased on January 29, 2021, long before any substantive activity by your clients or anyone connected to Glorifi, (ii) Old Glory Intellectual Property Holdings, LLC, was formed and filed in March of 2021, long before the first Glorifi entity, **WITH PURPOSE, INC.**, was formed on May 5, 2021, (iii) the first Old Glory Bank trademark was filed in March of 2021, long before the first Glorifi trademark was filed in August of 2021, and (iv) not a single public filing of any Old Glory Entity, including annual reports in Georgia, Delaware, or Oklahoma, ever listed a single person involved with Glorifi, including (without limitation) Mr. Nick Ayers.
4. You knowingly and intentionally state a false fact in your Complaint that the Old Glory Entities sent a Cease and Desist letter relating to Glorifi's marks as part of some fictitious conspiracy involving the Old Glory Entities and certain Defendants. While we assume you agree with us that Glorifi's filed marks are confusingly similar to our federally filed Old Glory Bank marks, which we first filed months *earlier* than any Glorifi mark, we handled this obvious legal issue by submitting a "letter of protest" with the USPTO, *not* by sending any cease and desist letter that you falsely claim in your Complaint.¹ You neither have a copy nor have you ever seen such a cease and desist letter, because you know such a letter does not exist. This knowing misrepresentation by you in your Complaint is clearly presented for purposes to harass the Old Glory Entities.
5. You falsely claim that Michael Ring's office for The Ring Firm is "upstairs" from an office occupied by an entity controlled by Michael Gearon (and allegedly utilized by Mr. Ayers for meetings), yet even the slightest work by you would discover that the address listed for The Ring Firm is a virtual office owned by Regus, and such address is used by dozens of companies, and a simple call to that office or visit to such office would establish that neither Mr. Mike Ring nor The Ring Firm actually has a physical office at such location.

As you know, the Old Glory Entities are not parties to any agreement or arrangement with your clients (or any Defendant) and have never done business with any of your clients or the Defendants in any manner, including in connection with Glorifi. Your clients' dispute with these Defendants is with such Defendants and the Old Glory Entities have nothing to do with those allegations or transactions. There is, and never has been, any nexus between the Old Glory Entities and its co-Defendants, as you allege. Therefore, your clients cannot validly allege claims against the Old Glory Entities under this Complaint and there can be no damages.

¹ As a lawyer, we assume you do actually know the difference between a trademark owner timely filing a "letter of protest" *with* the USPTO about a mark that is potentially confusingly similar, and a "cease and desist" letter, which was never sent by the Old Glory Entities to anyone associated with Glorifi. Thus, your claims that there exists a cease and desist letter sent by the Old Glory Entities as part of some fictitious conspiracy is an intentional misrepresentation by you and your clients in connection with this Complaint.

Because you do not have ANY evidentiary support for the factual contentions underlying the claims in your Complaint against the Old Glory Entities, it is clear that by you including the Old Glory Entities as Defendants in your Complaint, it is merely to harass, defame, and disparage a group of hard-working Americans who *actually* did successfully build and launch a Pro-America Bank.

Although it is your obligation under Federal Rule 11 that the factual contentions you set forth in your Complaint have evidentiary support (or will likely lead to evidentiary support), and the Old Glory Entities have no obligation to “prove the negative,” we do hereby attach the following affidavits and e-mails that confirm there exists no actual or likely evidentiary support (even following any investigation or discovery):

1. Affidavit from Mike Ring, Co-Founder, President, and Chief Executive Officer of the Old Glory Entities that confirms that he never had a single conversation with any of your clients or any of the Defendants (other than the Old Glory Entities), including (without limitation) Mr. Nick Ayers, in 2020, 2021, or 2022 about Glorifi or otherwise. Nick Ayers was not a client of, or ever worked with, Mike Ring or The Ring Firm, and the first and only time that Mr. Ring ever spoke to Mr. Nick Ayers was in February of 2024, at a breakfast arranged by a mutual friend. That the listed office for The Ring Firm at 3350 Riverwood Parkway, Suite 1900, Atlanta, GA 30339, is a “virtual” office and that neither Mike Ring, The Ring Firm, nor anyone associated with same has ever had a physical office at such location and has never taken a single meeting in such building including (without limitation) with Mr. Ayers or anyone connected to Glorifi. That none of the Old Glory Entities or affiliates have ever hired or engaged a single current or former employee or independent contractor of Glorifi, including (without limitation) Mr. Ayers.
2. E-mail string that originated by Mike Ring, dated January 28, 2021, to several Co-Founders of Old Glory suggesting that “*Old Glory Bank*” will be the name for their new venture, along with acknowledgement of the purchase of the applicable domain name.
3. Two E-mails and a Zoom invite from Eric Ohlhausen, Founder and Secretary of the Old Glory Entities, dated January 25, 2021, January 28, 2021, and February 1, 2021, relating to the initial work to be undertaken in connection with structuring and purchasing an FDIC-insured bank and the Old Glory cancel-proof digital payment solution.
4. Affidavit from Eric Ohlhausen, Co-Founder and Secretary of the Old Glory Entities that confirms that neither Mr. Nick Ayers nor any other Defendant listed in your Complaint has ever owned any stock, debt, or any other equity interest (or other financial arrangement) in any of the Old Glory Entities (or any affiliate), directly or indirectly, at any time.
5. Affidavit from two individuals who participated in Old Glory Bank investor presentations in early April 2021, that were given by Mike Ring, which included a fully developed Power Point Deck, structure, initial executive team, and marketing plan for Old Glory Bank, none of which ever mentioned or was related to Glorifi or Mr. Nick Ayers.
6. Affidavit from attorney Anne Marie Ring, who filed the trademarks for Old Glory Bank, who confirms that (i) neither Nick Ayers nor anyone connected to Glorifi had any involvement with the name or

mark Old Glory Bank, and (ii) no one on behalf of the Old Glory Entities ever sent a cease and desist letter to Glorifi or otherwise about the Glorifi name and mark (or otherwise).

7. Affidavit from Governor Mary Fallin-Christensen, a member of the Board of Directors of Old Glory Bank, who has been involved with the Old Glory Entities since early 2022, and who has known Nick Ayers for about 10 years, yet has not once spoken to Ayers in the prior 6 years and has never spoken to Ayers (or anyone on his behalf) about Glorifi or Old Glory Bank at any time.²
8. Affidavit from William Shine, a Co-Founder of Old Glory who has been involved with the Old Glory business concept since February of 2021, who served in the Trump Administration with Nick Ayers, yet the first time Shine talked with Ayers since leaving the Trump Administration in 2019, was in February 2024 (other than a quick text exchange on February 10, 2020, about the University of Georgia).³
9. Affidavit from J. Clay Christensen, who was the former President and CEO of First State Bank (which was acquired by Old Glory), and who was a large stockholder who led the sale of First State Bank to the Old Glory Entities, who is now on the Board of Directors of Old Glory Bank and is a large stockholder in the Old Glory Entities, who first started talking with Mike Ring in January 2022 about Old Glory, has never had a single conversation with anyone affiliated with Glorifi (including Mr. Nick Ayers) and has never had a conversation with anyone at Old Glory Bank about Glorifi or Nick Ayers, until the filing of your Complaint.
10. Affidavit from Oklahoma Attorney Paul Foster, who first started working with Mr. Ring and the Old Glory Entities in early 2022, who was personally involved with the structure of purchasing First State Bank and the filing of the change of control application with the Federal Reserve, who confirms that he never had a conversation with anyone at Glorifi (including Mr. Nick Ayers) and prior to the filing of your Complaint, the only conversation he had with representatives of the Old Glory Entities about Glorifi was to confirm that Glorifi (which sounded confusingly similar to Old Glory Bank) was *not* in any manner related to or connected with Old Glory Bank or the Old Glory Entities.

It is overwhelmingly clear that you have included the Old Glory Entities in your Complaint for improper purposes because you do not have a single item of evidentiary support for the facts you falsely allege in your Complaint about the Old Glory Entities. Further, with this letter, you now have actual evidence to affirmatively disprove your false and improper claims. If (and when) the TRO is lifted and you are otherwise permitted to make any filing under this Action, we hereby demand that you and your clients immediately dismiss each of the Old Glory Entities within 21 days of first being permitted to proceed in this Action, or each of you and your law firms will be liable for our attorney fees and expenses under Rule 11(b) of the Federal Rules of Procedure, and we will have our legal counsel pursue same in accordance with the appropriate rules and procedures. Further, we will file an O.C.G.A. § 9-15-14 motion against you and your law firms for attorney fees and expenses.

² Of course, if your fictitious conspiracy claims about Mr. Ayers being “secretly” involved with Old Glory Bank were actually true, then it is obvious that Governor Fallin would have known about it as she personally knew Ayers for 10 years.

³ Of course, if your fictitious conspiracy claims about Mr. Ayers being “secretly” involved with Old Glory Bank were actually true, then it is obvious that Mr. Shine would have known about it as he personally knew and worked with Ayers.

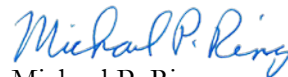
Separately, it is indisputable that the Old Glory Bank domain was acquired on January 29, 2021 (which is clearly set forth within WhoIS), the Old Glory Bank's Deck and Marketing Plan was fully developed and presented in April 2021 (per the affidavits referenced above), each of which is months before Glorifi commenced any actual business activity. **In this regard, by your Client's own admission in your Complaint, Glorifi did not even produce any brand standards until late 2021. The Old Glory Entities had a fully produced investor presentation with initial brand values in April 2021, which is when the Old Glory Entities first started making investor presentations** (per the affidavits referenced above). We note that in your Complaint, your clients acknowledge that their operations did *not* even commence until June 1, 2021, **MONTHS FOLLOWING WHEN OLD GLORY BANK HAD COMMENCED OPERATIONS**, which was in January/February of 2021, and months *after* when the Old Glory Entities started making investor pitches in early April 2021 (per the affidavits above).

If you fail to timely dismiss the Old Glory Entities from this Action at the first opportunity to do so, we will immediately file a motion under Rule 12(b)(6), and upon succeeding in that motion (which we will), we will make the necessary notice filings under Rule 11(b) and O.C.G.A. § 9-15-14 against each of you and your law firms.

You are hereby directed to respond to this letter by July 12, 2024, confirming that you do agree to timely dismiss the Old Glory Entities from this Action at the first opportunity to do so. However, please be advised that this letter is not a settlement offer and is **not** protected as privileged or confidential. Rather, this letter is intended to be admissible and available for review by others, including putting each of you, your firms, and your clients on notice of your clear and intentional wrongful conduct in connection with signing and filing this Complaint.

This letter is without prejudice to any and all rights and remedies available at law or in equity to the Old Glory Entities, each of which are hereby expressly reserved.

Very truly yours,



Michael P. Ring

As Authorized Signature of the Old Glory Entities

RingM@OldGloryBank.com

678.608.2790

Attachments

AFFIDAVIT OF MICHAEL P. RING

1. My name is Michael P. Ring and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the “Old Glory Entities”).
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the “Complaint”).
5. I am a co-founder and President and CEO of the Old Glory Entities.
6. I have never had any conversation with any Plaintiff or any Defendant (other than the Old Glory Entities) about Glorifi, including (without limitation) Mr. Nick Ayers, in 2020, 2021, or 2022.
7. The one and only conversation I ever had with Mr. Nick Ayers was in February 2024, at a breakfast arranged by a mutual friend.
8. Neither I nor The Ring Firm (my law firm), have ever represented any of the Defendants (other than the Old Glory Entities), including (without limitation) Mr. Nick Ayers.
9. Mr. Nick Ayers was never involved in any manner with the conception or creation of the Old Glory Entities and/or the Old Glory Bank model or brand.
10. None of the Old Glory Entities (or any affiliate) have ever hired or engaged any current or former employee or independent contractor of Glorifi, including (without limitation) Mr. Nick Ayers.

11. I personally created the name “Old Glory Bank,” based on a suggestion from a client for a different business idea, which client is wholly unconnected to any Plaintiff or Defendant or anyone otherwise connected to Glorifi, including (without limitation), Mr. Nick Ayers.
12. The e-mail string, that I initiated on January 28, 2021 relating to the origin of the Old Glory Bank name, is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 23, 2024



Michael P. Ring

Mike Ring

From: Michael P. Ring
Sent: Friday, January 29, 2021 9:55 AM
To: 'Eric Ohlhausen'; 'Michael Staw'
Cc: 'Maria Harvey'
Subject: RE: Old Glory Bank

Oh my. That literally brought a tear to my eye. I've never heard that.

That poem perfectly encapsulates our side of the isle and why we need to keep fighting for this cause. So many people died to create a country of self-governance, and self-governance will die without freedom of speech, freedom to peacefully assemble, and freedom to bear arms.

Old Glory Bank will be a raggedy old bank, with deposits from deplorables, who clearly put country ahead of self.

[The Ring Firm, P.C.](#)
[3350 Riverwood Parkway](#)
[Suite 1900](#)
[Atlanta, Georgia 30339](#)
[Direct: 678.608.2790](#)
[Fax: 678.608.2791](#)
RingM@RingFirm.com

From: Eric Ohlhausen [REDACTED] >
Sent: Thursday, January 28, 2021 11:09 PM
To: Michael Staw [REDACTED]; Michael P. Ring <RingM@ringfirm.com>
Cc: Maria Harvey [REDACTED] >
Subject: RE: Old Glory Bank

It's a shame Johnny Cash isn't around to be spokesman.

You've reminded me of this gem. Well worth the listen.

-Eric

From: Michael Staw [REDACTED] >
Sent: Thursday, January 28, 2021 10:24 PM
To: Michael P. Ring <RingM@ringfirm.com>
Cc: Eric Ohlhausen [REDACTED] >; Maria Harvey [REDACTED])
Subject: Re: Old Glory Bank

Great name!

Sent from my iPad

On Jan 28, 2021, at 9:58 PM, Michael P. Ring <RingM@ringfirm.com> wrote:

Hello Folks,

Another day, and another name.

Today's new favorite is Old Glory Bank. I was able to buy the domain name, www.oldglorybank.com. Easy to spell and easy to remember.

I think it works GREAT with Michael's slogan: "What color is your card?"

With Old Glory Bank, we can do a lot on the consumer side, in connection with flags, colors, etc.

Please let me know your first-reaction.

Thanks,

Ringer

The Ring Firm, P.C.
3350 Riverwood Parkway
Suite 1900
Atlanta, Georgia 30339
Direct: 678.608.2790
Fax: 678.608.2791
RingM@RingFirm.com

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From: Eric Ohlhausen <eric@████████.net>

Date: Mon, Feb 1, 2021 at 10:30 AM

Subject: Bank Search

To: Michael Rediker <mrediker@████████.com>

Michael,

I spoke with my partners, and we would like to move ahead with a search for an FDIC-insured, state-chartered bank.

We are developing technology that we'd like to marry with a licensed bank.

A conservative regulatory environment is preferred, as well, so we are focusing on Alabama, Florida and Mississippi, as well as states like Montana, Idaho, Wyoming, Utah and the Dakotas.

Our greater interest is in having the platform, as opposed to acquiring an earnings stream. With that in mind, how would you characterize the availability of banks in the \$5-7MM purchase price range? What size would that typically be--\$50MM in assets?

Let's talk when you have a few minutes.

Thanks,

Eric

Eric W. Ohlhausen

Elkmont Group, LLC

Atlanta, GA

404-449-6924 m

www.████████.net

[linkedin.com/in/eohlhausen](https://www.linkedin.com/in/eohlhausen)

From: **Eric Ohlhausen** <eric@elkmont.net>

Date: Wed, Jan 27, 2021 at 10:21 AM

Subject: Frank Brown Referral

To: <[mrediker@\[REDACTED\].com](mailto:mrediker@[REDACTED].com)>

Mike,

Thanks for connecting on LinkedIn.

I spoke with Frank Brown yesterday about an investor group that has an interest in purchasing a bank.

I would appreciate a brief conversation when your schedule allows, as Frank recommended you highly as someone who would have a good sense of the current market.

Regards,

Eric

Eric W. Ohlhausen

Elkmont Group, LLC

Atlanta, GA

404-449-6924 m

[www.\[REDACTED\].net](http://www.[REDACTED].net)

[linkedin.com/in/eohlhausen](https://www.linkedin.com/in/eohlhausen)

Cancel-Proof PayPal Zoom Meeting



Michael P. Ring <RingM@ringfirm.com>

Required Michael Staw; Maria Harvey (Maria@[REDACTED].com); Eric Ohlhausen



No Response Required



None



This meeting request was updated after this message was sent. You should open a later update or open the item on the calendar.



Monday, January 25, 2021 3:00 PM-4:00 PM



<https://zoom.us/j/98109873716?pwd=TitVak5vRUdsanVKWSszT1lkR0ZHUT09>

Michael Ring is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://zoom.us/j/98109873716?pwd=TitVak5vRUdsanVKWSszT1lkR0ZHUT09>

Meeting ID: 981 0987 3716

Passcode: 321779

One tap mobile

+13126266799,,98109873716#,,,,*321779# US (Chicago)

+19292056099,,98109873716#,,,,*321779# US (New York)

AFFIDAVIT OF ERIC OHLHAUSEN

1. My name is Eric Ohlhausen and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the “Old Glory Entities”).
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the “Complaint”).
5. I am a co-founder and the Secretary of the Old Glory Entities and the Chief Strategy Officer of Old Glory Bank.
6. I have never had any conversation with any Plaintiff or any Defendant (other than the Old Glory Entities) about Glorifi, including (without limitation) Mr. Nick Ayers, in 2020, 2021, or 2022.
7. The one and only conversation I ever had with Mr. Nick Ayers was in February 2024, at a breakfast that I attended.
8. Mr. Nick Ayers was never involved in any manner with the conception or creation of the Old Glory Entities and/or the Old Glory Bank model, structure, or brand.
9. None of the Old Glory Entities (or any affiliate) have ever hired or engaged any current or former employee or independent contractor of Glorifi, including (without limitation) Mr. Nick Ayers.

10. Neither Mr. Ayers nor anyone listed in the Complaint (other than Mike Ring) has ever owned or held (directly or indirectly) stock, debt, or any other equity interest (or other financial arrangement) in any of the Old Glory Entities (or any affiliate), at any time.
11. I personally created the idea for a Pro-America financial institution (“FI”) and called Mike Ring with the idea in December of 2020. As part of that first conversation, Ring mentioned that he loved the idea but did not have the current time or desire to be involved.
12. Mike Ring called me to say that he had listened to Mike Lindell being interviewed on the Sean Hannity radio show on January 20, 2021, and that my idea for a Pro-America FI was now more important than ever. He also stated that, in addition to creating a Pro-America FI, it also is imperative that we build a closed-loop payment solution.
13. The evidence of a Zoom meeting that Mike Ring initiated on January 25, 2021, about a cancel-proof digital payment solution is accurate, and that Zoom meeting did occur.
14. The e-mails that I initiated on January 26 and February 1, 2021, about purchasing an FDIC Bank are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.



Eric Ohlhausen

Dated: June 23, 2024

AFFIDAVIT OF RYAN CALDWELL

1. My name is Ryan Caldwell and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the “Old Glory Entities”).
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta Division Case No. 1:24-cv-02148-ELR (the “Complaint”).
5. I have been a partner of various investment funds for more than 20 years.
6. I have known Mike Ring as a lawyer since 2013, and he and I worked together in a boxing business in 2014, 2015, and 2016.
7. In April of 2021, Ring connected with me about viewing a presentation for Old Glory Bank on April 8, 2021. The attached meeting invite for a Zoom presentation on April 8, 2021 is true and correct.
8. I participated in the April 8, 2021, Zoom presentation and was extremely impressed with the Old Glory Bank legal structure, the offering terms and brand values, all of which were fully developed.
9. Although an investment in the Old Glory Entities was not aligned with the funds I represented, I was thoroughly excited about the Old Glory Bank concept.
10. At no time did Mr. Nick Ayers or anyone listed in this Complaint (other than the Old Glory Entities) participate in this Zoom presentation, and no one from the Old Glory Entities

suggested Glorifi, Mr. Nick Ayers or anyone connected with Glorifi was involved in any manner.

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 23, 2024

A handwritten signature in black ink, appearing to read 'Ryan Caldwell', written over a horizontal line.

Ryan Caldwell

Michael P. Ring

Subject: Old Glory Bank Presentation for the RC!
Location: <https://zoom.us/j/95486050142?pwd=a1gydHlrcGd0WkFuQ0NwVldCcmlvQT09>

Start: Thu 4/8/2021 11:30 AM
End: Thu 4/8/2021 12:30 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Michael P. Ring
Required Attendees Eric Ohlhausen; Caldwell, Ryan

Michael Ring is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://zoom.us/j/95486050142?pwd=a1gydHlrcGd0WkFuQ0NwVldCcmlvQT09>

Meeting ID: 954 8605 0142

Passcode: 399242

One tap mobile

+13126266799,,95486050142#,,,,*399242# US (Chicago)

+19292056099,,95486050142#,,,,*399242# US (New York)

Dial by your location

+1 312 626 6799 US (Chicago)

+1 929 205 6099 US (New York)

+1 301 715 8592 US (Washington DC)

+1 346 248 7799 US (Houston)

+1 669 900 6833 US (San Jose)

+1 253 215 8782 US (Tacoma)

Meeting ID: 954 8605 0142

Passcode: 399242

Find your local number: <https://zoom.us/u/acakK5kNfV>

AFFIDAVIT OF MIKE BOYLSON

1. My name is Mike Boylson and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the "Old Glory Entities").
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta Division Case No. 1:24-cv-02148-ELR (the "Complaint").
5. I am a co-founder and Chief Marketing Officer of Old Glory Bank. I am formerly the Chief Marketing Officer of JCPenney.
6. I have known Mike Ring as a lawyer for about 10 years. In March of 2021, Ring connected with me about viewing a presentation for Old Glory Bank on April 5, 2021. The attached meeting invite for a Zoom presentation on April 5, 2021 is true and correct.
7. I participated in the April 5, 2021 Zoom presentation and was thoroughly amazed with the customer value-proposition, the Old Glory Bank legal structure, the offering terms and brand values, all of which were fully developed.
8. Although I did not have the current capacity to participate as an investor in the Old Glory Entities, I was so thoroughly excited about the Old Glory Bank concept that I offered to help in any way. Later in the summer of 2021, I was brought on as a co-founder and Chief Marketing Officer, where I continue to serve in such capacity as of the date hereof.
9. I have never had any conversation with any Plaintiff or any Defendant (other than the Old Glory Entities) about Glorifi, including (without limitation) Mr. Nick Ayers, at any time.

10. I have never met or talked with Mr. Nick Ayers.

11. I personally participated in the brand messaging and final logo for “Old Glory Bank” and no one connected with Glorifi, including (without limitation), Mr. Nick Ayers, was ever involved.

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 23, 2024


W:\4\969651\0623_2024\20240623\1001

Mike Boylson

Michael P. Ring

Subject: Old Glory Presentation
Location: <https://zoom.us/j/91663199978?pwd=SkRibnFGL2pIWjhwZzg5TzkzbG84Zz09>
Start: Mon 4/5/2021 11:00 AM
End: Mon 4/5/2021 11:30 AM
Recurrence: (none)
Meeting Status: Meeting organizer
Organizer: Michael P. Ring
Required Attendees Mike Boylson; Michael [REDACTED]

Michael Ring is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting
<https://zoom.us/j/91663199978?pwd=SkRibnFGL2pIWjhwZzg5TzkzbG84Zz09>

Meeting ID: 916 6319 9978
Passcode: 221427
One tap mobile
+13126266799,,91663199978#,,,,*221427# US (Chicago)
+19292056099,,91663199978#,,,,*221427# US (New York)

Dial by your location

- +1 312 626 6799 US (Chicago)
- +1 929 205 6099 US (New York)
- +1 301 715 8592 US (Washington DC)
- +1 346 248 7799 US (Houston)
- +1 669 900 6833 US (San Jose)
- +1 253 215 8782 US (Tacoma)

Meeting ID: 916 6319 9978
Passcode: 221427
Find your local number: <https://zoom.us/u/amZlg9k6o>

AFFIDAVIT OF ANNE MARIE H. RING

1. My name is Anne Marie H. Ring and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the “Old Glory Entities”).
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the “Complaint”).
5. I am a co-founder of the Old Glory Entities and the Chief Legal Officer of Old Glory Bank.
6. I personally filed or directed the filings of the Old Glory Bank trademarks and none of the Plaintiffs or Defendants in the Complaint (other than the Old Glory Entities), including (without limitation) Mr. Nick Ayers, had any involvement in any trademark creation, analysis, review, and/or filing.
7. I have never had any conversation with any Plaintiff or any Defendant (other than the Old Glory Entities) about Glorifi, including (without limitation) Mr. Nick Ayers.
8. I have never represented any of the Plaintiffs or Defendants (other than the Old Glory Entities), including (without limitation) Mr. Nick Ayers, including (without limitation) for trademark matters.
9. Mr. Nick Ayers was never involved in any manner with the conception or creation of the Old Glory Entities and/or the Old Glory Bank name or trademark.
10. The Old Glory Entities *never* sent a “cease and desist” letter (or other communication) to Glorifi and/or any Plaintiff or Defendant about the Old Glory trademarks or otherwise. The

filing of a “letter of protest” with the USPTO about the confusingly similar nature of the name and mark “Glorifi” was initiated at the sole direction of the Old Glory Entities and *never* in consultation (or otherwise) with Mr. Nick Ayers or any other Plaintiff or Defendant in the Complaint (other than the Old Glory Entities).

I declare under penalty of perjury that the foregoing is true and correct.



Anne Marie H. Ring

Dated: June 24, 2024

AFFIDAVIT OF MARY FALLIN-CHRISTENSEN

1. My name is Mary Fallin-Christensen and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the “Old Glory Entities”).
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the “Complaint”).
5. I have been talking with Mike Ring about Old Glory Bank since February of 2022. I have been a member of the Board of Directors of Old Glory Bank since November of 2022.
6. I have personally known Mr. Nick Ayers for about 10 years. However, I have not spoken with Mr. Ayers in about 6 years and I have *never* had any conversation with Mr. Ayers or any other Plaintiff or Defendant listed in the Complaint (other than the Old Glory Entities) about Glorifi or Old Glory Bank.

I declare under penalty of perjury that the foregoing is true and correct.



Mary Fallin-Christensen

Dated: June 23, 2024

AFFIDAVIT OF WILLIAM SHINE

1. My name is William Shine and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the "Old Glory Entities").
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the "Complaint").
5. I have been talking with Mike Ring about Old Glory Bank since February of 2021. I am a Co-Founder of the Old Glory Entities and serve as Executive Chairman.
6. I served with Mr. Nick Ayers in the White House (Trump Administration). I left the White House in 2019, had one text exchange with Ayers on February 10, 2020 about the University of Georgia, but the first time I had any conversation with Mr. Nick Ayers since leaving the White House was on the phone in February of 2024. I *never* had any conversation with Mr. Ayers or any other Plaintiff or Defendant listed in the Complaint (other than the Old Glory Entities) about Glorifi or Old Glory Bank at any time, until I reconnected with Ayers in February of 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 23, 2024


William Shine (Jun 24, 2024 05:01 EDT)

William Shine

AFFIDAVIT OF J. CLAY CHRISTENSEN

1. My name is J. Clay Christensen and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the "Old Glory Entities").
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the "Complaint").
5. I have been talking with Mike Ring about Old Glory Bank since January of 2022, when he and Mr. Eric Ohlhausen first contacted me about purchasing First State Bank in Elmore City, OK ("FSB").
6. I am the former President and CEO of FSB and a former beneficial owner of FSB. On behalf of all of the beneficial owners of FSB, I personally led the negotiations to sell FSB to Old Glory Holding Company.
7. I have been a member of the Board of Directors of Old Glory Bank since November of 2022. I beneficially hold stock in Old Glory Holding Company.
8. In the 29 months since I first started talking with Mr. Ring about Old Glory Bank (i.e., January 2022), there has never been a single discussion about Glorifi or Mr. Nick Ayers until this Complaint. I have never met or communicated with Mr. Nick Ayers or any other Plaintiff or Defendant in the Complaint (other than the Old Glory Entities).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 23, 2024




J. Clay Christensen

AFFIDAVIT OF PAUL FOSTER

1. My name is Paul Foster and I am over 18 years of age.
2. I have personal knowledge of the facts stated in this affidavit.
3. This Affidavit is given voluntarily and in support of Old Glory Holding Company and Old Glory Intellectual Property Holdings, LLC (the "Old Glory Entities").
4. I am aware of the Complaint filed by WPI Collateral Management, LLC, *et al*, against Vivek Ramaswamy, *et al*, and the Old Glory Entities, in the Northern District Court for the Northern District of Georgia, Atlanta, Division, Case No. 1:24-cv-02148-ELR (the "Complaint").
5. I am an attorney and member of the BAR in the State of Oklahoma. I am the named partner in the Paul Foster Law Offices, P.C.
6. I was first contacted in January of 2022, by Mike Ring and Eric Ohlhausen about representation relating to the Old Glory Bank. I was formally engaged by Old Glory Holding Company in March of 2022 to assist with the purchase of First State Bank in Elmore City, OK ("FSB") and the necessary filings with the Federal Reserve.
7. In the 29 months since I first started talking with Messrs. Ring and Ohlhausen about Old Glory Bank (i.e., January 2022), there has never been a single discussion about Glorifi or Mr. Nick Ayers prior to the filing of this Complaint, other than my confirming with Mr. Ring that Glorifi was *not* connected to the Old Glory Entities or Old Glory Bank, even though its name seemed similar to Old Glory Bank. I have never met or communicated with Mr. Nick Ayers or any other Plaintiff or Defendant in the Complaint (other than the Old Glory Entities and Old Glory Bank).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2024



Paul Foster, Esq