

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
(Civil Division)

3D GLOBAL SOLUTIONS, INC.

Plaintiff

v.

Civil Action No. 06cv00722 (GK)

MVM, INC.

Defendant

AFFIDAVIT

1. I am over the age of eighteen and a resident of Virginia.
2. I was an employee of MVM, Inc. from September 2005 to January 2006.
3. My job title at MVM was Operations Coordinator and my duties consisted of support to Director of International Operations on the ESF Kabul, Afghanistan contract.
4. I am personally aware of the facts and circumstances regarding the contract between MVM Inc. and 3D Global Solutions, Inc. ("3D") as it relates to third country nationals ("TCN's") obtained from Peru and sent to Afghanistan for security services.
5. I was personally involved in the processing of information derived from the evaluation of the TCN's and spent several weeks in Peru.
6. All TCN's provided to MVM sent from Peru to Afghanistan were qualified and had met the level of English speaking proficiency requirement in the contract to the best of my knowledge.
7. The requirements for the level of English proficiency was vague but from what I understood, the TCN's provided by 3D had complied with the contract between the parties.
8. As an MVM employee and while in Peru, I had met each and every TCN that was provided by 3D prior to their deployment to Kabul, Afghanistan.
9. To my knowledge MVM never requested 3D to replace any TCN.
10. Each and every TCN, approximately 230 individuals, recruited by 3D that were deployed to Kabul Afghanistan received and executed an employment contract with MVM.
11. It is my understanding that MVM obtained a payment from the U.S. Government for the services provided in Afghanistan.

12. I am also aware of the proprietary information placed in what are called "administrative packages" that was created for each and every TCN and sent to the U.S. Department of State. It is my understanding these administrative packages were sold by MVM to Triple Canopy for profit.
13. The employment contract provided to the TCN's by MVM was written in English.

By signing below, I, Jaysen Turner, swear under penalty of perjury that the foregoing statements contained in this affidavit are true and correct based on my personal knowledge.


Jaysen Turner

Dated: 3/1/07