

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
IN AND FOR HILLSBOROUGH COUNTY, STATE OF FLORIDA  
CIVIL DIVISION

NITRO MOBILE SOLUTIONS, LLC.,  
a Florida Limited Liability Corporation,

Plaintiff,

Case No. 17-CA-010953  
Division J

v.

EYE C SOLUTIONS, LLC,  
A Florida Limited Liability Corporation, and  
LISA MONNET, an individual,

Defendants.

\_\_\_\_\_/

EYE C SOLUTIONS, LLC, and  
LISA MONNET,

Counterclaim Plaintiffs,

v.

NITRO MOBILE SOLUTIONS, LLC,  
PETE SLADE, and MOLLY SLADE,

Counterclaim Defendants.

\_\_\_\_\_/

**UNSWORN DECLARATION OF ASHBY GREEN**

I, Ashby Green, affirm the following:

I am over 18 years old and have personal knowledge of the facts set forth in this  
declaration.

1. I was working with Nitro Mobile Solutions, LLC between October 2, 2017 and  
November 21, 2017, the period during which Lisa Monnet began working with Nitro.

EXHIBIT mm |

2. I was aware that the Nitro offices at 501 East Kennedy Blvd., Suite 910, Tampa, Florida were under security surveillance, and that Nitro's research and development investment via its Artificial Intelligence also allowed for voice detection in various areas of the office.
3. I had been party to multiple conversations where Ms. Monnet had talked about Richard Branson and the Virgin Group's investment into Nitro.
4. I initially began working with Nitro to assist with investment in the capacity of CFO.
5. I participated in multiple investment meetings and discussions with Ms. Monnet, including meetings determining where each of us would focus investment efforts.
6. On multiple occasions, I witnessed Ms. Monnet talk about her financial success with her aviation business, and discuss her homes in Longboat Key and Lake Como, Italy.
7. I witnessed Monnet describe how her aviation business consistently provided "Angel Flights" to enable sick children to be transported for care.
8. I had been assigned tasks by Ms. Monnet to complete in preparation of Richard Branson and Virgin Group's investment into Nitro.
9. I had executed a Virgin Confidentiality Agreement that I had been required to sign in person.
10. I was party to conversations with Ms. Monnet, during which she would explain how Richard Branson did not want there to be any other investors into Nitro, and as a result we would need determine how best to return the \$200,000 investment that had been received to-date.

11. In her capacity as Nitro's interim CEO, and based on Ms. Monnet's request and friendship with Richard Branson, she was the conduit through which all communication with Richard Branson and the Virgin Group occurred.
12. I witnessed Monnet on numerous occasions, represent that material terms had been agreed to in principle with Richard Brandon and they would be reflected into a term sheet.
13. I witnessed Ms. Monnet in her capacity as Nitro's interim CEO, assign specific tasks to others with regard to the Richard Branson and Virgin Group pending investment.
14. In her capacity as Nitro's interim CEO, and at Ms. Monnet's request, I ceased, and witnessed others do the same, seeking investment into the business and focused solely on providing the materials, proposals, logistics and plans required by Richard Branson and/or the Virgin Group.
15. In her capacity as Nitro's interim CEO, and at Ms. Monnet's request, Nitro halted and did not pursue its partner program, instead focusing on a direct sales force for various territories within the United States and the United Kingdom.
16. I witnessed Ms. Monnet insist that Richard wanted to have appliances manufactured within the United Kingdom.
17. I witnessed Ms. Monnet insist that it was a priority for Richard to open an office in London and that Nitro should engage real estate companies in London, England, to understand pricing and availability.

18. I witnessed Monnet represent that she had negotiated a provision into the draft investment documents allowing the Virgin Group first right of refusal on any future capital raise.
19. On multiple occasions, I witnessed Ms. Monnet disclose that Richard Branson was a good close friend of hers, therefore she knew how Richard operates.
20. On multiple occasions, I witnessed Ms. Monnet remind everyone that “this was a done deal,” and that there was no need to focus on anything else.
21. I participated in the preparations for Richard Branson’s visit to Nitro’s offices up to and including November 17, 2017.
22. I participated in the conversations with Nitro’s existing investors as they learned that Ms. Monnet had misled both them and Nitro.
23. I participated in the conversations with Nitro’s existing investors where, based solely on her actions, they elected to withdraw their investment from Nitro.

***Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on \_\_\_\_\_ MARCH 19th \_\_\_\_\_, 2018.***

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Ashby Green 