

SWORN AFFIDAVIT

Name: Jonathan David Ballard

Date of Birth: October 22, 1972

Business Address: 3290 W Big Beaver Rd, Troy, Michigan, 48084

My name is Jonathan David Ballard, and I am a private investigator licensed by the State of Florida. License number C3000288. I am employed by the Robison Group.

I have been a private investigator since November of 2020. Prior to becoming a private investigator, I served for approximately 26 years as a Police Officer, Police Sergeant, and Police Lieutenant for Police Departments in New York State.

I have extensive training in conducting investigations and in conducting interviews and taking both written and verbal statements.

In my capacity as both a private investigator and law enforcement officer I have conducted thousands and thousands of interviews and taken thousands of sworn statements or depositions.

On Tuesday, April 8, 2025, I was working in my capacity as a private investigator for the Robison Group when I called Dara Cooley at (727) 888-1140.

Ms. Cooley advised that in May of 2020, she estimates that Wilkes and Associates had 25 attorneys and 75 additional support staff for a total of 100 employees. She added that some may have been working from home as this was during the COVID-19 outbreak.

On Friday, April 11, 2025 , I was working in my capacity as a private investigator for the Robison Group when I spoke with Timothy Kulig at (941) 567-7121.

Regarding a bank account at Wells Fargo that he opened while working as CFO at Wilkes and Associates that also had the name of Erika Girardi on it, Mr. Kulig did say that he had opened the account at the behest of Mr. Wilkes himself and he had made what he thinks were three sizeable deposits. He did not remember the total amount, but did confirm that a total of \$400,000.00 sounded about right. He also could not remember the specific dates, but he knows it would have been in 2020 or 2021.

He added that he knew Erika Gerardi. He stated that he had not known her personally and had never met her in person, but he knew of her and had talked to her on the phone.

He further stated that he facilitated opening the account with Mr. Wilkes' funds. The funds would have been personal funds from Mr. Wilkes or from a distribution from the firm. He went on to say that Mr. Wilkes had multiple business entities, and Mr. Kulig's job was to manage things and move money around. When he was asked to do that, he would do so, usually without questioning it.

He believes that his own name was also on the account and that this would be normal with any accounts he handled for Mr. Wilkes as Mr. Wilkes was not involved in the minutia and having his name on the account would facilitate him handling things for Mr. Wilkes.

On Monday, April 14, 2025, I was working in my capacity as a private investigator for the

Robison Group when I spoke with Timothy Kulig at (941) 567-7121.

Mr. Kulig was asked how many employees Wilkes and Associates had on May 20, 2020. He initially stated that it was so long ago he could not remember. He was asked if he could give an estimate, or if he could say if it was over or under 100, and he replied that if he was going to say a number the number he would have said would have been 100 total employees.

Later he was asked to verify again that his best estimate would be 100 employees, and he replied that yes, this is the number he would use, but he is not 100% sure.

STATE OF FLORIDA,
COUNTY OF Indian River___, Sworn (or affirmed) and subscribed to me, by means of
☒ physical presence or ☐ online notarization, this 5 day of May, 2025___ by

JONATHAN DAVID BALLAN
Name of person making statement

☒ Personally known to me OR

Jonathan David Ballan
Signature of person making statement

☐ Produced identification

Vivian L. Mayes
Signature of Notary Public per F.S. 117.10

