

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY,

Receiver,

v.

No. 3:09-CV-00724-N

JAMES A. ALGUIRE, et al.,

Defendants.

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DECLARATION OF DEFENDANT ROBERTO ULLOA

Roberto Ulloa declares:

1. I am a former employee for Stanford Financial Group ("SFG"). I submit this declaration in support of Roberto Ulloa's Motion to Dismiss Receiver's Second Amended Complaint Against Former Stanford Employees (the "Receiver's Complaint") and Compel Arbitration in the United States District Court for the Northern District of Texas, Dallas Division.

2. I started working at Stanford Fiduciary Investor Services, a subsidiary of Stanford Trust Company Ltd. Antigua, on June 10, 2002.

3. In June 2006, I began working as a financial advisor for SFG.

4. As part of my employment as a financial advisor, I was required to execute a standard Form U-4 Uniform Application for Securities Industry Registration or Transfer ("Form U-4"). A Form U-4 was submitted to the Financial Industry Regulatory Authority ("FINRA") by SFG in order for me to obtain my securities license. Form U-4s contain a standard arbitration provision stating:

I agree to arbitrate any dispute, claim or controversy that may arise between me and my firm, or a customer, or any other person, that is required to be arbitrated under the rules, constitutions, or by-laws of the SROs indicated in Section 4 (SRO REGISTRATION) as may be amended from time to time and that any arbitration award rendered against me may be entered as a judgment in any court of competent jurisdiction.

DECLARATION OF DEFENDANT ROBERTO ULLOA

5. My employment at SFG ended February 17, 2009. I was not allowed to retain any documents from my office when I was instructed to vacate the premises.

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

Executed on January ____, 2010.

A handwritten signature in black ink, consisting of a large, stylized 'R' and 'U' that are interconnected. The signature is written over a horizontal line that serves as a baseline for the name below.

ROBERTO ULLOA

DECLARATION OF DEFENDANT ROBERTO ULLOA