

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARINKA PESCHMANN,

Plaintiff,

vs.

BLOGTALKRADIO, INC., CINCHCAST,
INC., STEPHEN QUAYLE, DOUGLAS
HAGMANN and DOES 1-20,

Defendants.

Civil Action No. 15-CV-09504 (PGG)

pg SQ
**DECLARATION OF STEVEN QUAYLE IN
SUPPORT OF MOTION TO DISMISS**

pg SQ
STEVEN QUAYLE, of full age, hereby declares under penalty of perjury as follows:

1. I am an individual residing in Montana and a defendant in this matter. I submit this affidavit in support of the instant motion to dismiss the Plaintiff's First Amended Complaint, dated January 15, 2016, pursuant to Fed.R.Civ.P. 12(b)(2) for lack of personal jurisdiction and, in the alternative, pursuant to Fed.R.Civ.P. 12(b)(6) for Plaintiff's failure to state any claims upon which relief may be granted.

2. I occasionally make "guest" appearances on an online radio broadcast with defendant Douglas^{3rd} Hagmann and his son called the Hagmann & Hagmann Report ("H&H Report"), which is recorded in Pennsylvania. I call in from my home in Montana. The H&H Report may be accessed by a user entering the website of defendant BlogTalkRadio, Inc. and clicking on a podcast. The H&H Report is also broadcast through YouTube.

3. As a "guest" of the H&H Report, I do not solicit nor direct any business in or to the State of New York, other than what may passively occur as a result of a New York individual seeking our online broadcasts through the internet.

4. In addition to the H&H Report, I maintain and operate a website, through which I sell various items, including books I've written. I do not directly solicit any donations in or to the State of New York, other than what may passively occur as a result of a New York individual seeking our online broadcasts through the internet.

5. I have no assets in New York: no offices, bank accounts, personal or real property.

6. My only connection to New York is that I have been served with this lawsuit.

7. I hereby declare under penalty of perjury that the foregoing statements made by me are true to the best of my knowledge.


Steven Quayle

Dated: 10/26/16