

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

MARIELLE (“MOLLY”) KRONBERG,)	
)	
Plaintiff,)	
)	
-v-)	
)	Civil No. 1:09-cv-00947-AJT-TRJ
LYNDON LAROCHE, et al,)	
)	
Defendants.)	
)	

**DECLARATION OF MICHAEL J. MINNICINO CONCERNING CERTAIN
MATTERS RAISED IN THE MOTION TO DISQUALIFY ATTORNEY
MARKHAM**

MICHAEL J. MINNICINO declares, under penalties of perjury, as follows:

- (1) I make this declaration stating herein only matters known to me of my own personal knowledge as gained by me in the manner described below.
- (2) I was co-founder and co-owner of World Composition Services, Inc. with Ken Kronberg in 1978; I was that firm's Vice-President and Sales Manager. Later, I became Vice-President and Sales Manager of PMR Printing Company, Inc. I held those positions until the closing of those companies in 2007. As such, I was in daily communication with Ken Kronberg, the President of both those companies, and involved in the day-to-day activities of both.
- (3) At no time in the course of our 28 years working together, did Ken Kronberg report to me or did I hear him say that these companies were targets in criminal prosecutions led by AUSA Markham, by AUSA Robinson, or by anyone else. At no time did I hear him say that he was personally under investigation by the IRS or any other

governmental agency for any matter.

(4) I did have repeated conversations with Ken Kronberg in which he stated that both companies, WorldComp and PMR, were in significant arrears to the IRS; that he was in constant negotiations with the IRS to resolve these issues; and that a lawyer had been retained to assist in those negotiations.

(5) While an executive and officer of those companies, and since that time, I have never been contacted by representatives of the IRS, by Messrs. Markham or Robinson or their representatives, or by any federal law enforcement officials. Nor, to my knowledge, has either of the companies been so contacted.

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

Executed this 16th day of December, 2009 in Leesburg, Virginia.



Michael J. Minnicino