A handwritten signature in black ink, appearing to read "Anna D. Levin". The signature is fluid and cursive, with a small dot above the "i" in "Levin".

CLERK OF THE COURT

EXHIBIT 6

1 **ACOM**  
ALEXANDER ROBERTSON, IV  
2 State Bar No. 8642  
JONATHAN S. VICK  
3 State Bar No. 8707  
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7 Attorneys for Plaintiffs

8 DISTRICT COURT  
9 CLARK COUNTY, NEVADA  
10

11 TED R. BURKE; MICHAEL R. and  
LAURETTA L. KEHOE; JOHN BERTOLDO;  
12 PAUL BARNARD; EDDY KRAVETZ;  
JACKIE and FRED KRAVETZ; STEVE  
13 FRANKS; PAULA MARIA BARNARD;  
LEON GOLDEN; C.A. MURFF; GERDA  
14 FERN BILLBE; BOB and ROBYN TRESKA;  
MICHAEL RANDOLPH; and FREDERICK  
15 WILLIS,

16 Plaintiffs,

17 vs.

18 LARRY H. HAHN, individually, and as  
President and Treasurer of Kokoweeff, Inc., and  
19 former President and Treasurer of Explorations  
Incorporated of Nevada; HAHN'S WORLD OF  
20 SURPLUS, INC., a Nevada corporation;  
PATRICK C. CLARY, an individual; DOES 1  
21 through 100, inclusive;

22 Defendants,

23 and

24 KOKOWEEF, INC., a Nevada corporation;  
EXPLORATIONS INCORPORATED OF  
25 NEVADA, a dissolved corporation,

26 Nominal Defendants.  
27  
28

FILED

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CLERK OF THE COURT

) CASE NO. A558629

) Dept. XIII

) **VERIFIED DERIVATIVE FIRST**  
) **AMENDED COMPLAINT**

) (1) VIOLATION OF NRS. 90.460 (Unlawful  
) Sale of Securities);

) (2) VIOLATION OF NRS. 90.570 (Unlawful  
) Sale of Securities by Means of Scheme to  
) Defraud);

) (3) FRAUDULENT

) MISREPRESENTATIONS;

) (4) NEGLIGENT

) MISREPRESENTATIONS;

) (5) FRAUD IN THE INDUCEMENT;

) (6) FRAUDULENT CONCEALMENT;

) (7) BREACH OF FIDUCIARY DUTY;

) (8) UNJUST ENRICHMENT;

) (9) CONSTRUCTIVE FRAUD;

) (10) CORPORATE WASTE.

) **Exempt from Arbitration**

) (Shareholders Derivative Action - Equitable  
) Relief)

COMES NOW, Plaintiffs, TED R. BURKE, MICHAEL R. and LAURETTA L. KEHOE, JOHN BERTOLDO, PAUL BARNARD, EDDY KRAVETZ, STEVE FRANKS, PAULA MARIA BARNARD, LEON GOLDEN, C.A. MURFF, GERDA FERN BILLBE, BOB and ROBYN TRESKA,; MICHAEL RANDOLPH, and FREDERICK WILLIS (collectively hereinafter referred to as the "Plaintiffs"), who bring this group action against Defendants, LARRY H. HAHN, in his individual capacity and as President and Treasurer of Kokoweef, Inc., and former President and Treasurer of Explorations Incorporated of Nevada,; HAHN'S WORLD OF SURPLUS, INC., a Nevada corporation; PATRICK C. CLARY, an individual; and DOES 1 thought 100, inclusive (hereinafter collectively referred to as "Defendants"), and allege, based upon information and belief, except as otherwise stated, as follows:

**NATURE OF THE ACTION AND FACTUAL ALLEGATIONS**

1. This lawsuit involves a scheme among the Defendants through which Plaintiffs were fraudulently induced into purchasing shares of corporate stock in a gold mine investment managed by Defendant, LARRY L. HAHN. The mine is located approximately eleven miles south of state line in San Bernardino County, California. Over the past twenty-five (25) years, Defendant, LARRY L. HAHN (hereinafter "HAHN") has solicited and sold investments in this gold mine to over twelve hundred (1,200) investors throughout the country.

2. EXPLORATIONS INCORPORATED OF NEVADA (hereinafter "EIN") was incorporated on October 24, 1984, for the purpose of exploration and continuing the search for gold in underground caverns. During EIN's corporate existence, Defendant, LARRY L. HAHN, issued an undetermined number of shares to literally hundreds of investors in the gold mine for a sale price of \$6 per share. The issuance of these shares of stock in EIN violated both federal and state securities laws as more fully alleged herein.

3. Defendant, PATRICK C. CLARY, ESQ., was the corporate counsel to EIN, and at all times relevant herein, was and is the corporate counsel to KOKOWEEF, INC. (hereinafter referred to as "KOKOWEEF"). On or about November 10, 2005, EIN entered into an "Agreement and Plan of Reorganization" with KOKOWEEF, whereby EIN agreed to sell and assign to KOKOWEEF all of EIN's assets and KOKOWEEF agreed to assume all of the

1 liabilities of EIN, "excepting liability to the Old Company's [EIN] stockholders", in exchange for  
2 voting shares of KOKOWEEF's common stock. KOKOWEEF was incorporated by Defendant  
3 HAHN on or about May 25, 2004. Defendant CLARY acted as both corporate counsel for EIN  
4 and the surviving corporation, KOKOWEEF.

5 4. On or about October 12, 2006, Defendant CLARY sent a written notice to the  
6 stockholders of EIN informing them that he was corporate counsel to both EIN and  
7 KOKOWEEF and that on November 10, 2005, EIN and KOKOWEEF entered into a "Agreement  
8 and Plan of Reorganization", whereby EIN agreed to sell and assign to KOKOWEEF all of EIN's  
9 assets in exchange for the voting shares of KOKOWEEF's common stock. Defendant CLARY's  
10 letter instructed each stockholder of EIN to return his or her stock certificates to KOKOWEEF in  
11 exchange for a new KOKOWEEF stock certificate.

12 5. Plaintiffs are informed and believe, and thereon allege, that Defendants failed to  
13 keep records of the identities of the approximately 1,200 investors in EIN and KOKOWEEF, the  
14 amount of consideration paid by each investor for their stock, and the number of shares issued by  
15 Defendants to each investor. Further, Plaintiffs are informed and believe, and thereon allege, that  
16 Defendants failed to maintain financial statements and follow generally accepted accounting  
17 principals for both EIN and KOKOWEEF.

18 6. Plaintiffs are further informed and believe, and thereon allege, that the "Plan of  
19 Reorganization" between EIN and KOKOWEEF was a scheme concocted by Defendants HAHN  
20 and CLARY to conceal from the stockholders the Defendants' sale of unregistered and non-  
21 exempt securities in violation of NRS 90.460.

22 7. Plaintiffs are informed and believe, and thereon allege, that over the past twenty-  
23 five (25) years, Defendants, HAHN and DOES 1 through 50, inclusive, solicited the sale of  
24 securities in EIN and KOKOWEEF as part of a scheme to defraud Plaintiffs and other investors,  
25 whereby Defendants used the sale of unregistered securities to finance the construction of a  
26 private compound used solely for the personal use of Defendants at the mine location. Plaintiffs  
27 are further informed and believe that in furtherance of this scheme to defraud the Plaintiffs and  
28 other investors, Defendants, HAHN and DOES 1 through 50, inclusive, prohibited any

1 unannounced visits to the mine site and would only allow access to the mine and the Defendants'  
2 private compound on special occasions, when Defendants would give a tour of the mine, mining  
3 equipment and promote the progress of the mining operation, although in fact no serious mining  
4 operations were regularly conducted by the Defendants. Plaintiffs are informed and believe, and  
5 thereon alleged, that Defendants HAHN and DOES 1 through 50, inclusive, used the proceeds of  
6 the sale of unregistered securities to finance their own lifestyle, construction of their compound  
7 and living expenses and not in furtherance of a commercial mining operation as represented by  
8 the Defendants to the Plaintiffs.

9 8. On or about September 16, 2006, an assayer retained by EIN presented Defendant  
10 HAHN with an analytical report, which indicated the presence of gold and silver and other  
11 valuable mineral at depth in the mine.

12 9. In the Spring of 2007, the President of Mayan Gold, Inc. met with HAHN and  
13 Plaintiff BURKE regarding a proposal of Four Million Dollars (\$4,000,000) in investment capital  
14 to recover gold, silver and other valuable minerals in the mine in a joint venture with  
15 KOKOWEEF. At this meeting, the President of Mayan Gold, Inc. made a standard request to  
16 review the books and financial records of KOKOWEEF as part of his due dilligence  
17 investigation. In response to this request, Defendant HAHN abruptly terminated the meeting and  
18 rejected Mayan Gold's \$4 million investment offer.

19 10. On or about June of 2007, Plaintiff BURKE and several other shareholders  
20 discovered the existence of the Bylaws of KOKOWEEF, and upon reviewing those Bylaws, had  
21 reason to suspect that KOKOWEEF's business practices were in conflict with the Bylaws.  
22 Plaintiff BURKE asked Defendant HAHN whether or not an annual audit of KOKOWEEF's  
23 financial records had ever been performed. Defendant HAHN informed BURKE that no such  
24 audit have ever been performed and refused to make KOKOWEEF's books and financial records  
25 available to BURKE, despite the fact that BURKE was a Director and Secretary of  
26 KOKOWEEF.

27 11. BURKE then informed HAHN that he was going to request a board meeting to  
28 address his concerns and to request a formal audit be conducted of KOKOWEEF's books.

1 BURKE also discussed his request for an audit with Defendant CLARY, who informed BURKE  
2 that the board meeting could be held on August 28, 2007, at CLARY's office.

3 12. Upon learning that BURKE had requested a meeting of the board of directors of  
4 KOKOWEEF to be scheduled on August 28, 2007, HAHN then noticed a "Special Meeting" of  
5 all shareholders to be held on the same date to vote on new Board members. Defendant HAHN  
6 failed to give proper notice of the "Special Meeting" pursuant to the Bylaws. HAHN noticed the  
7 location for this "Shareholder Meeting" to be held at the mine location, which was approximately  
8 seventy (70) miles from the location of the Board meeting in Las Vegas making it impossible to  
9 attend both meetings. As a result, the Board meeting was never held and BURKE and other  
10 Plaintiffs attended the shareholder meeting on August 28, 2007. At the shareholder meeting,  
11 HAHN nominated five (5) individuals for the Board of Directors without any prior notice to the  
12 shareholders or the existing Board of Directors, again in violation of the Bylaws. HAHN also  
13 announced at the shareholder meeting that he would consent to an audit of KOKOWEEF's books  
14 and financial records. However, the subsequent audit directed by BURKE was only performed  
15 on the financial records of KOKOWEEF for a period of the preceding eight (8) months and no  
16 review of the financial records of the predecessor entity, EIN, was allowed by HAHN.

17 13. On or about September 18, 2007, BURKE was invited to attend a meeting with  
18 Defendants HAHN and CLARY. At that meeting, BURKE asked Defendant CLARY what his  
19 personal liability was as a Director of KOKOWEEF for what BURKE perceived to be  
20 KOKOWEEF's violation of the Bylaws and for what he believed to be HAHN's  
21 misappropriation of corporate funds to pay for his personal expenses. At this meeting, Defendant  
22 CLARY informed BURKE that the reason KOKOWEEF was formed was an attempt to "clean  
23 up" the multiple securities violations of EIN. Defendant CLARY further informed BURKE that  
24 ninety percent (90%) of EIN's stock sales by Defendant HAHN were unlawful. When BURKE  
25 stated his intent to report these unlawful activities to the Securities and Exchange Commission  
26 ("SEC"), Defendant CLARY told BURKE going to the SEC was "insane", that the SEC was "the  
27 big bad wolf", that the SEC were "assholes", and that "they destroy companies and they destroy  
28 people." Further, Defendant CLARY told BURKE, "I just don't want you to do anything stupid,

1 I mean, the idea of going to talk to the SEC is about as insane as anything you could personally  
2 do. I mean, if you want to just stick a knife in yourself, it'd be a shorter way to solve the  
3 problem."

4 14. Defendant CLARY further advised BURKE that although "99% probably of the  
5 securities transactions weren't conducted lawfully. The statute of limitations has run."  
6 However, Defendant CLARY did not tell BURKE that Defendants HAHN and DOES 1 through  
7 50, inclusive, issued approximately 1,057,565 shares of unregistered securities in KOKOWEEF  
8 during 2007 to approximately 580 investors at a price of \$6 per share, which is well within the  
9 applicable statute of limitations provided by NRS §960.670.

10 15. Defendant CLARY admitted to BURKE at this meeting that he had concocted the  
11 scheme to "reorganize" EIN to exchange EIN's shares for KOKOWEEF shares in order to  
12 conceal the illegality of the sale of EIN securities and to conceal these illegal transactions from  
13 the shareholders until hopefully the statute of limitations has lapsed before the shareholders  
14 discovered this securities fraud.

15 16. During the September 18, 2007 meeting, BURKE asked Defendant CLARY the  
16 direct question, "You are general counsel for KOKOWEEF, Inc., right?" Mr. CLARY responded  
17 that in fact he was general counsel for the corporation and was not acting as general counsel for  
18 Defendant HAHN. However, at that same meeting, BURKE expressed his concerns over  
19 improprieties in the issuance of securities for EIN and KOKOWEEF, as well as the corporation's  
20 failure to maintain adequate financial records and comply with the Bylaws. In response, attorney  
21 CLARY stated that if something went wrong he would correct it or "make it go away." Also,  
22 during this meeting, Defendant CLARY informed BURKE that the issuance of 70,000 shares of  
23 stock in KOKOWEEF to BURKE was illegal and created a tax liability for BURKE and all other  
24 shareholders who had been given shares of stock in exchange for alleged services contributed to  
25 the corporation. Defendant CLARY stated that he would inform all of the shareholders that they  
26 needed to file amended tax returns, but the Plaintiffs are informed and believe, and thereon  
27 allege, that as of the date of filing this action, Defendant CLARY has failed to give notice to the  
28 shareholders of this tax liability.

1           17.     Plaintiffs are informed and believe, and thereon allege, that commencing in 2003  
2 to the present, Defendant HAHN has written checks from the KOKOWEEF and EIN bank  
3 accounts to himself and his separately owned company, HAHN'S WORLD OF SURPLUS, INC.,  
4 (hereinafter "HAHN'S WORLD") for personal use. Defendant HAHN has wasted corporate  
5 assets and converted corporate assets for his own personal benefit and use, thereby breaching his  
6 fiduciary duty owed to the Plaintiffs as a director.

7           18.     During the September 18, 2007 meeting, Defendant CLARY also advised  
8 BURKE that the sales of securities in EIN and KOKOWEEF did not need to be registered with  
9 the SEC, because they fell within an exemption provided by Rule 504 of Regulation D.  
10 However, Plaintiffs are informed and believe, and thereon allege, that the sale of securities in  
11 EIN and KOKOWEEF were not eligible for the exemption provided by Rule 504 of Regulation  
12 D of the SEC because neither EIN or KOKOWEEF registered the offering of shares with the  
13 State of Nevada or filed a Registration Statement with the State of Nevada or delivered  
14 substantive disclosure documents as required to investors such as Plaintiffs. Further, neither EIN  
15 nor KOKOWEEF filed a Form D after they first sold their securities, which is a requirement  
16 under Rule 504 of Regulation D. Additionally, Defendant CLARY advised BURKE that the sale  
17 of securities of EIN and KOKOWEEF were also exempt under Nevada securities laws.  
18 However, Plaintiffs are informed and believe, and thereon allege, that these representations were  
19 also false in that none of the transactions complied with the exemptions provided by NRS §9.520  
20 or NRS §9.530.

21           19.     Plaintiff, TED R. BURKE (hereinafter "BURKE"), was and is a resident of Clark  
22 County, Nevada, and was at all relevant times until approximately March 26, 2008, was a  
23 director and corporate secretary of KOKOWEEF. On or about May 1, 2007, Defendant HAHN  
24 issued 75,000 shares of KOKOWEEF stock to BURKE.

25           20.     Plaintiffs, MICHAEL R. KEHOE and LAURETTA L. KEHOE (collectively  
26 referred to herein as "KEHOES"), were and are residents of Clark County, Nevada. During all  
27 relevant times herein, the KEHOES were issued 1,100 shares of KOKOWEEF shares of stock on  
28 or about October 4, 2006.



1           21.     Plaintiff, JOHN BERTOLDO (hereinafter "BERTOLDO"), was and is a resident  
2 of Clark County, Nevada. During all times relevant herein, BERTOLDO was issued 5,000  
3 shares of EIN stock, which were exchanged for KOKOWEEF shares on or about October 4,  
4 2006.

5           22.     Plaintiff, PAUL BERNARD (hereinafter "BERNARD"), was and is a resident of  
6 Clark County, Nevada. During all times relevant herein, BERNARD was issued 2,000 shares of  
7 EIN stock, which were exchanged for KOKOWEEF shares on or about March 6, 2007.

8           23.     Plaintiff, EDDY KRAVETZ (hereinafter "KRAVETZ"), was and is a resident of  
9 Clark County, Nevada. During all relevant times herein, KRAVETZ was issued 834 shares of  
10 EIN stock, which were exchanged for KOKOWEEF shares on or about March 13, 2007.

11           24.     Plaintiffs, JACKIE and FRED KRAVETZ (collectively referred to herein as  
12 "KRAVETZ"), were and are residents of Clark County, Nevada. During all times relevant  
13 herein, the KRAVETZ were issued 500 shares of EIN stock, which were exchanged for  
14 KOKOWEEF shares of stock on or about March 6, 2007.

15           25.     Plaintiff, STEVEN FRANKS (hereinafter "FRANKS"), was and is a resident of  
16 Clark County, Nevada. During all times relevant herein, FRANKS was issued 400 shares of EIN  
17 stock, which were exchanged for KOKOWEEF shares of stock on or about March 2007.

18           26.     Plaintiff, PAUL MARIA BARNARD (hereinafter "BARNARD"), was and is a  
19 resident of Clark County, Nevada. During all times relevant herein, BARNARD was issued 100  
20 shares of EIN stock, which were exchanged for KOKOWEEF shares of stock on or about March  
21 18, 2007.

22           27.     Plaintiff, LEON GOLDEN (hereinafter "GOLDEN"), was and is a resident of  
23 Clark County, Nevada. During all times relevant herein, GOLDEN was issued 100 shares of EIN  
24 stock, which were exchanged for KOKOWEEF shares of stock on or about March 1, 2007.

25           28.     Plaintiff, C.A. MURFF (hereinafter "MURFF"), was and is a resident of Clark  
26 County, Nevada. During all times relevant herein, MURFF was issued 100 shares of EIN stock,  
27 which were exchanged for KOKOWEEF shares of stock on or about March 2007.

28     ROBERTSON  
   & VICK, LLP

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1           29.     Plaintiff, GERDA FERN BILLBE (hereinafter "BILLBE"), was and is a resident  
2 of Clark County, Nevada. During all times herein, BILLBE was issued 1,234 shares of EIN  
3 stock, which were exchanged for KOKOWEEF shares on or about March 28, 2007.

4           30.     Plaintiffs, BOB and ROBYN TRESKA (hereinafter "TRESKAS"), were and are  
5 residents of Clark County, Nevada. During all times relevant herein, the TRESKAS were issued  
6 100 shares of EIN stock, which were exchanged for KOKOWEEF shares of stock by the Plan of  
7 Reorganization dated August 31, 2006.

8           31.     Plaintiff, MICHAEL RANDOLPH (hereinafter "RANDOLPH"), was and is a  
9 resident of Clark County, Nevada. During all times relevant herein, RANDOLPH was issued  
10 1,000 shares of EIN stock, which were exchanged for KOKOWEEF shares of stock by the Plan  
11 of Reorganization dated August 31, 2006.

12           32.     Plaintiff, FREDERICK WILLIS (hereinafter "WILLIS"), was and is a resident of  
13 Clark County, Nevada. During all times relevant herein, WILLIS was issued 100 shares of EIN  
14 stock, which were exchanged for KOKOWEEF shares of stock by the Plan of Reorganization  
15 dated August 31, 2006.

16           33.     Defendant, LARRY L. HAHN, is and was a resident of Clark County, Nevada,  
17 and is and has been the President and Treasurer of Kokoweef since its incorporation in 2004, and  
18 was the President and Treasurer of EIN since its incorporation in 1984.

19           34.     Nominal Defendant, EIN, a Nevada corporation, was incorporated on October 24,  
20 2984 and was dissolved on November 15, 2007.

21           35.     Nominal Defendant, KOKOWEEF, is a fully organized Nevada corporation in  
22 good standing that was incorporated on May 25, 2004.

23           36.     Defendant, HAHN'S WORLD OF SURPLUS, INC. (hereinafter referred to as  
24 HAHN'S WORLD") is a Nevada corporation doing business in North Las Vegas, Clark County,  
25 Nevada, and is located at 2908 East lake Mead Boulevard, North Las Vegas, Nevada. HAHN'S  
26 WORLD was incorporated in 1977 and HAHN was the President of that corporation until the  
27 time that he transferred that office to his family members, although HAHN still maintains control  
28 of that corporation.

1           37.     Plaintiffs are ignorant of the true names of the Defendants sued as DOES 1  
2 through 100, inclusive, and therefore Plaintiffs sue these Defendants by such fictitious names.  
3 Following further investigation and discovery, Plaintiffs will seek leave of the Court to amend  
4 this Complaint to allege their true names and capacities when ascertained. These fictitiously  
5 named Defendants may be KOKOWEEF's shareholders, officers, directors, and other members  
6 of management, consultants and other entities, who were involved in the wrongdoing detailed  
7 herein. These Defendants aided and abetted, participated with and/or conspired with the named  
8 Defendants in the wrongful acts and course of conduct or otherwise caused damages and injuries  
9 claimed herein and are responsible in some manner for the acts, occurrences and events alleged  
10 in this Complaint.

11           38.     Plaintiffs are informed and believe, and thereon allege, that KOKOWEEF,  
12 HAHN, HAHN'S WORLD and DOES 1 through 100, inclusive, are, and at all times mentioned  
13 herein were, the alter-ego of each other, in that there now exists, and at all times mentioned  
14 herein there existed, such unity of interest in ownership between these Defendants, and each of  
15 them, such that any individuality and separateness has ceased in that each of the Defendants is,  
16 and at all times mentioned herein was, a mere shell, instrumentality and conduit through which  
17 each of the other Defendants carry on their business in the corporate name, exercising such  
18 control and dominance of each of the other Defendants to such an extent that any individuality of  
19 separateness of a Defendant did not and does not exist. Any further adherence to the fiction of a  
20 separate existence of these several Defendants as entities distinct from each of the other  
21 Defendants would permit an abuse of the corporate privilege and would sanction a fraud on  
22 Plaintiffs. Plaintiffs are further informed and believe that said Defendants managed and operated  
23 the corporate and affiliated entities and intermingled the assets of each to suit their convenience  
24 by placing and conveying assets fraudulently among the Defendants in order to evade payment of  
25 obligations and to render other Defendants insolvent and unable to meet their obligations to  
26 Plaintiffs.

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& VICK, LLP

**DERIVATIVE AND DEMAND EXCUSED ALLEGATIONS**

39. Plaintiffs bring this derivative action for the benefit of Kokoweef and EIN to redress injuries suffered and to be suffered by Kokoweef and EIN as a result of the breaches of fiduciary duty and unjust enrichment of Hahn and other Defendants.

40. Plaintiffs will adequately and fairly represent the interest of Kokoweef and EIN and its shareholders in enforcing and prosecuting its rights.

41. At all times relevant to this action, Plaintiffs are shareholders of Kokoweef stock and were owners of EIN stock until EIN stock was exchanged for Kokoweef stock in August of 2006.

42. As a result of the facts set forth herein, Plaintiffs have not made any demand on the Kokoweef Board of Directors to institute this action against Hahn. Such demand would be a futile and useless act because the Board is incapable of making an independent and disinterested decision to institute and vigorously prosecute this action for the following reasons:

a. Due to Hahn's positions as President and Treasurer, and holding almost a majority of the shares, he is in a position to and does control the Board, the company and its operations. There are seven board members, two of which are controlled by Hahn. However, a quorum of five is required to hold a board meeting.

b. Hahn will not permit a board meeting to occur unless he institutes it for matters he wants to discuss. This was evident when Burke scheduled a board meeting for August 28, 2007, to discuss an audit and also to request Hahn to step down. Hahn then scheduled a shareholders meeting for that same date to be held 70 miles from the place of the board meeting and it was impossible to attend both meetings.

c. Based on the summary of the September 19, 2007, meeting provided above and the attached Transcript of the meeting among Burke, Hahn, Clary, and other officers, it is obvious Hahn controls Kokoweef, and that he would find ways to obstruct a board meeting regarding the filing of a shareholders' derivative complaint.

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**FIRST CAUSE OF ACTION**

**(Violation of NRS § 90.460 for the Unlawful Sale of  
Unregistered Securities against Defendants HAHN, CLARY and DOES 1-50, Inclusive)**

43. Plaintiffs reallege and incorporate herein by reference the allegations contained in paragraphs 1 through 38 above as though fully set forth herein.

44. Defendants, and each of them, was an “issuer”, “promoter” and/or “control person” as defined by NRS §§ 90.255, 90.275, 90.275 and 90.660(4).

45. Defendants issued securities, which were not exempt from registration, to Plaintiffs without abiding by the registration requirements of Nevada, did not have any preemption therefrom, and therefore Plaintiffs, under NRS § 90.660, may recover the consideration paid for the security and the interest at the legal rate of the state from the date of the payment, costs and reasonable attorneys’ fees, less the amount of income received on the security.

46. Plaintiffs discovered the violations of NRS 90.660 within two (2) years of the filing of this action, and within five (5) years after the act, omission or transaction constituting the violations.

47. Plaintiffs are also entitled to all remedies available under NRS § 90.640, including a temporary restraining order, permanent or temporary prohibitory or mandatory injunction or a writ of prohibition or mandamus; appointment of a receiver, the imposition of a civil penalty of not more than \$2,500 for a single violation or \$100,000 for multiple violations in a single proceeding or a series of related proceedings; declaratory judgment; restitution; the appointment of a receiver or conservator for the Defendants’ assets; an order of payment of the Division’s investigative costs; or an order of such other relief as the court deems just and proper.

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**SECOND CAUSE OF ACTION**

**(Violation of NRS § 90.570 for the Unlawful Sale of a  
Security by Means of a Scheme to Defraud Against Defendants HAHN, CLARY  
and Does 1-50, Inclusive)**

48. Plaintiffs reallege and incorporate herein by reference the allegations contained in paragraphs 1 through 38 above as though fully set forth herein.

49. Defendants, through the sale of unregistered securities, have employed a device, scheme or artifice to defraud members of the public described in specificity in paragraphs 1 through 38 above, by making false representations that these securities were exempt from registration and the disclosure and prospectus requirements of both federal and Nevada securities laws and that the Plaintiffs' investment in EIN and KOKOWEEF was for the purpose of mining explorations with the expectation of profit. Further fraudulent representations made by the defendants consisted of representations that the Plaintiffs' investment capital would be used to fund the commercial mining operation, but were in fact used by Defendants for their own personal use and benefit.

50. As alleged herein-above, Defendants made several untrue statements of material facts and/or omitted to state material facts necessary in order to make the statements made not misleading and true under the circumstances concerning the defendants' actual use of the Plaintiffs' investment capital and the fact that defendants knew that the sale of these unregistered securities were illegal and violated both federal and state laws and exposed Plaintiffs to tax liabilities.

51. Defendants, through the false and fraudulent sales of these unregistered securities, engaged in acts, practices and/or a course of business which operated as a fraud or deceit upon Plaintiffs by inducing Plaintiffs to purchase these securities. Moreover, Defendants either knew, and in the existence of reasonable care should have known, of the nature of their untrue statements and misleading omissions, or made the utterances with conscious or reckless disregard for the truth of these statements but made them to defraud Plaintiffs.

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1           52.     The Plaintiffs did not know that the statements of material facts made to them by  
2 Defendants during the sale of securities to them were untrue or that there was an omission of a  
3 statement of material facts.

4           53.     Plaintiffs did not receive any written offer, including financial or other  
5 information necessary to correct all material misstatements or omissions in the information  
6 required to be furnished to Plaintiffs, at the time of sale of these securities.

7           54.     Defendants, pursuant to the fraudulent scheme, business practice, and on the basis  
8 of untrue material facts and omissions, issued securities to the Plaintiffs, which are not exempt  
9 from registration, without abiding by the registration requirements of Nevada, and therefore  
10 Plaintiffs, under NRS § 90.660, may recover the consideration paid for the securities and interest  
11 at the legal rate of the state from the date of payment, costs and reasonable attorneys' fees, less  
12 the amount of income received on the securities.

13           55.     Plaintiffs discovered the Defendants' fraud within two (2) years of the filing of  
14 this action, and withing five (5) years after the act, omission or transaction constituting the  
15 violations.

16           56.     Plaintiffs are also entitled to all remedies available under NRS § 90.640, including  
17 a Temporary Restraining Order, permanent or temporary prohibitory or mandatory injunction or a  
18 writ of prohibition or mandamus; appointment of a receiver, the imposition of a civil penalty of  
19 not more than \$2,500 for a single violation or \$100,000 for multiple violations in a single  
20 proceeding or a series of related proceedings; declaratory judgment; restitution; the appointment  
21 of a receiver or conservator for the Defendants' assets; an order of payment of the Division's  
22 investigative costs; or an order of such other relief as the court deems just and proper.

23                   **THIRD CAUSE OF ACTION**

24                   **(Fraudulent Misrepresentation Against Defendants HAHN**

25                   **and DOES 1-100, Inclusive)**

26           57.     Plaintiffs reallege and incorporate herein by reference the allegations contained in  
27 paragraphs 1 through 38 above as though fully set forth herein.

28     ///

ROBERTSON  
& VICK, LLP

1           58. Defendants made false and fraudulent misrepresentations as described with  
2 specificity above and incorporated by reference herein.

3           59. Defendants, and each of them, made these representations with the knowledge or  
4 belief that the representations were false or with an insufficient basis of information for making  
5 these representations to Plaintiffs.

6           60. Defendants intended to induce Plaintiffs to act upon the misrepresentations by  
7 entering into the purchase of the securities by the Defendants.

8           61. Plaintiffs were ignorant of the truth of the misrepresentations and concealments  
9 made by Defendants and in fact justifiably relied on the misrepresentations made by Defendants,  
10 and each of them.

11           62. As a direct and proximate result of Defendants' misstatements and  
12 misrepresentations of material facts, Plaintiffs purchased securities from the Defendants in EIN  
13 and KOKOWEEF and have suffered damages as more fully set forth herein in an amount to be  
14 proved at trial.

15           63. As a result, Plaintiffs are, in the alternative, entitled to rescission of the contract, an  
16 accounting and the return of any and all money or property given, plus interest and expenses.

17           64. Defendants had actual knowledge of the fact that the representations were in fact  
18 false, and for these reasons, and because the conduct by these Defendants was malicious,  
19 oppressive and/or fraudulent, Plaintiffs are, therefore, entitled to punitive damages to make an  
20 example of and to punish these Defendants in addition to actual damages.

21                           **FOURTH CAUSE OF ACTION**

22                           **(Negligent Misrepresentation Against Defendants HAHN, CLARY**  
23                           **and DOES 1-100, Inclusive)**

24           65. Plaintiffs reallege and incorporate herein by reference the allegations contained in  
25 paragraphs 1 through 38 above as though fully set forth herein.

26           66. Defendants supplied false guidance to the Plaintiffs in the sale of the securities of  
27 EIN and KOKOWEEF by representing that such sales were exempt from registration under both



1 federal and Nevada securities laws when in fact the sale of these securities were illegal and not  
2 exempt from registration under either federal or Nevada securities laws.

3 67. The misrepresentations made to Plaintiffs included the false and fraudulent  
4 statements described above in this First Amended Complaint and incorporated herein by  
5 reference.

6 68. Defendants, and each of them, made these representations negligently, and  
7 without any reasonable basis for believing them to be true.

8 69. Plaintiffs were ignorant of the truth of the misrepresentations and concealments  
9 made by Defendants and in fact justifiably relied on the misrepresentations made by Defendants.

10 70. As a direct and proximate result of Defendants' misstatements and  
11 misrepresentations of material facts, Plaintiffs purchased securities from the Defendants in EIN  
12 and KOKOWEEF and have suffered damages as more fully set forth herein in an amount to be  
13 proved at trial.

14 71. As a result, Plaintiffs are, in the alternative, entitled to rescission of the purchase of  
15 their securities, an accounting and the return of any and all money or property given, plus interest  
16 and expenses.

17 **FIFTH CAUSE OF ACTION**

18 **(Fraud In The Inducement Against Defendants HAHN, CLARY**  
19 **and DOES 1-100, Inclusive)**

20 72. Plaintiffs reallege and incorporate herein by reference the allegations contained in  
21 paragraphs 1 through 38 above as though fully set forth herein.

22 73. Plaintiffs purchased securities from the Defendants in EIN and KOKOWEEF  
23 based upon the false representations made to Plaintiffs in order to induce them to purchase these  
24 securities.

25 74. The false representations made to Plaintiffs included, *in alia*, the fraudulent  
26 statements described with specificity above and incorporated by reference herein.

27 75. Defendants presented numerous false representations regarding the exemption  
28 from registration of the securities under both federal and state law to Plaintiffs, and the fact that

1 Plaintiffs' investment capital would be used exclusively to finance the commercial mining  
2 operation of gold and silver and other precious metals at the mine, despite knowing the true and  
3 correct facts that the sale of all securities issued by Defendants in EIN and KOKOWEEF violated  
4 both federal and Nevada securities laws and that the proceeds of the sale of securities to the  
5 Plaintiffs would be used for the Defendants' personal use and benefit.

6 76. Defendants, and each of them, had a duty to disclose the true nature of all known  
7 material facts and circumstances surrounding the sale of securities to the Plaintiffs. Defendants  
8 had exclusive knowledge of all such material facts and such material facts were not known or  
9 reasonably accessible to Plaintiffs.

10 77. The concealment of the true facts from Plaintiffs were done with the intent to  
11 induce them to purchase the securities from the Defendants in both EIN and KOKOWEEF.

12 78. Plaintiffs' justifiable reliance on statements made by Defendants was justified as  
13 Defendant CLARY purported to have professional legal expertise concerning securities laws and  
14 Defendant HAHN had exclusive knowledge that the use of the Plaintiffs' investment capital was  
15 used for his own personal benefit instead of financing commercial mining operations at the mine.

16 79. As a result of Defendants false representations, Plaintiffs were unaware of the true  
17 nature of the facts concerning the legality of the purchase of shares from the Defendants in that  
18 their investments capital would be diverted for the Defendants own personal use and benefit.

19 80. As a result of these the false representations, Plaintiffs purchased securities from  
20 the Defendants in EIN and KOKOWEEF and suffered damages in an amount to be proven at  
21 trial.

22 81. As a result, Plaintiffs are, in the alternative, entitled to rescission of the contract,  
23 securities, an accounting and the return of any and all money or property given, plus interest and  
24 expenses.

25 82. Defendants had actual knowledge of the fact that the representations were in fact  
26 false, and for these reasons and because the conduct by these Defendants was malicious,  
27 oppressive and/or fraudulent, Plaintiffs are, therefore, entitled to punitive damages to make an  
28 example of and to punish these Defendants in addition to actual damages.

**SIXTH CAUSE OF ACTION**

**(Fraudulent Concealment Against Defendants HAHN, CLARY**

**and DOES 1-100, Inclusive)**

83. Plaintiffs reallege and incorporate herein by reference the allegations contained in paragraphs 1 through 38 above as though fully set forth herein.

84. Plaintiffs purchased securities from the Defendants and relied upon their representations that the purchase of these securities complied with all relevant federal and state securities laws and that the Plaintiffs investment capital would be used to finance the commercial mining operation, which would yield them dividends and a profit on their investment.

85. The material facts concealed from Plaintiffs including, *inter alia*, the fraudulent statements described with specificity above and incorporated herein by reference.

86. Defendants concealed and suppressed the material facts regarding the illegality of the sale of securities to them by the Defendants, despite knowing the true and correct facts regarding the securities. These misrepresentations were made and the true and correct facts concealed by Defendants in order to intentionally induce the Plaintiffs to purchase the securities in EIN and KOKOWEEF.

87. Defendants, and each of them, had a duty to disclose the true nature of all known material facts and circumstances surrounding the sale of securities and use of their investment capital by Defendants. Defendants had exclusive knowledge of all such material facts and such material facts were not known or reasonably accessible to Plaintiffs.

88. Plaintiffs' reliance on statements made by Defendants, and each of them, was justified as Defendant CLARY purported to have professional legal expertise concerning securities laws and Defendant HAHN had exclusive knowledge of the use of the Plaintiffs' investment capital in the mine.

89. As a result of Defendants intentional misrepresentations of material facts, Plaintiffs were unaware of the true nature of the facts alleged with specificity above herein. Had Plaintiffs been aware of the material facts concealed by Defendants, Plaintiffs would not have purchased securities from the Defendants.

90. As a result of the concealment alleged herein, Plaintiffs purchased securities from the Defendants and have suffered damages in an amount to be proven at trial.

91. As a result, Plaintiffs are, in the alternative, entitled to rescission of the purchase of the securities, an accounting and the return of any and all money or property given, plus interest and expenses.

92. Defendants had actual knowledge of the fact that the representations were in fact false, and for these reasons and because the conduct by these Defendants was malicious, oppressive and/or fraudulent, Plaintiffs are, therefore, entitled to punitive damages to make an example of and to punish these Defendants in addition to actual damages.

### SEVENTH CAUSE OF ACTION

**(Breach of Fiduciary Duty Against Defendant HAHN**

**and DOES 1 through 100, Inclusive)**

93. Plaintiffs incorporate herein by reference the allegations set forth in paragraphs 1 through 38 above as though fully set forth herein.

94. By reason of his position of President and Treasurer of KOKOWEEF and former President and Treasurer of EIN, Defendant HAHN owes Plaintiffs, as shareholders of those corporations, the fiduciary obligations of good faith, trust, loyalty and due care, and is required to use his utmost ability to control and manage the corporate affairs in a fair, just, honest and equitable manner. Defendants are required to act in the best interests of the corporation and its shareholders and not in the furtherance of his own personal interests or financial benefit. Defendants HAHN and DOES 1 through 100, inclusive, owe the corporation and its shareholders the fiduciary duty to exercise good faith and diligence in the administration of those corporations and in the use and preservation of its property and assets, and has the highest obligations of fair dealing.

95. Defendants HAHN and DOES 1 through 100, inclusive, violated and breached those duties by their actions described with specificity above.

96. As a direct and proximate result of the Defendants' breaches of fiduciary duties, the corporation and its shareholders have sustained damages in an amount to be proven at trial.

1           97.     Plaintiffs are entitled to an order that Defendants HAHN and DOES 1 through 50,  
2 inclusive, disgorge to EIN and KOKOWEEF, all proceeds and profits derived from their illegal  
3 activities.

4                                   **EIGHT CAUSE OF ACTION**

5           **(Unjust Enrichment Against Defendants HAHN, HAHN'S WORLD OF SURPLUS,**  
6                                   **and DOES 1 through 100, Inclusive)**

7           98.     Plaintiffs incorporate herein by reference the allegations set forth in paragraphs 1  
8 through 38 above as though fully set forth herein.

9           99.     Plaintiffs are informed and believe, and therein allege, that Defendants HAHN,  
10 HAHN'S WORLD, and DOES 1 through 100, inclusive, were unjustly enriched by the illegal  
11 transactions and activities of HAHN in the sale of unregistered securities and the diversion of  
12 corporate funds and assets for the personal use of HAHN and HAHN'S WORLD.

13          100.    It would be unjust and inequitable for these Defendants to retain the proceeds of  
14 these illegal transactions.

15          101.    To remedy the Defendants unjust enrichment, the Court should order the  
16 Defendants to disgorge to EIN and KOKOWEEF all proceeds and profits derived from their  
17 illegal activities.

18                                   **NINTH CAUSE OF ACTION**

19                                   **(Constructive Fraud Against Defendants HAHN,**  
20                                   **and DOES 1 through 100, Inclusive)**

21          102.    Plaintiffs incorporate herein by reference the allegations set forth in paragraphs 1  
22 through 38 above as though fully set forth herein.

23          103.    As fiduciaries to EIN and KOKOWEEF, Defendants owed EIN and  
24 KOKOWEEF, and their shareholders, a duty of candor and full and accurate disclosures  
25 regarding the sale of share in the financial transactions involving these corporations.

26          104.    As described above, these Defendants made, or aided and abetted the making of  
27 the misrepresentations and concealment of material facts despite their duties to, *in alia*, disclose  
28 the true facts regarding EIN and KOKOWEEF to the Plaintiffs.

105. As a results of these Defendants constructive fraud, EIN and KOKOWEEF have sustained and will continue to sustain injuries for which they have no adequate remedy at law.

106. The acts Defendants named herein, and each of them, were done maliciously, oppressively and with the intent to defraud. Plaintiffs, on behalf of EIN and KOKOWEEF, are entitled to punitive and exemplary damages in an amount to be shown according to proof at the time of trial.

### TENTH CAUSE OF ACTION

**(Corporate Waste Against Defendants HAHN, and  
DOES 1 through 100, Inclusive)**

107. Plaintiffs incorporate herein by reference the allegations set forth in paragraphs 1 through 38 above as though fully set forth herein.

108. By failing to properly consider the interests of EIN and KOKOWEEF and its shareholders, Defendants HAHN and DOES 1 through 50, inclusive, without any valid corporate purpose, have caused EIN and KOKOWEEF to waste valuable corporate assets solely for the financial gain of these Defendants.

109. In return for such wrongful diversion of corporate assets, KOKOWEEF received no consideration, rendering the transaction in effect a gift to these Defendants.

110. The conduct of these Defendants, and each of them, was not in good faith. Defendants intentionally and directly diverted EIN and KOKOWEEF assets to their own use and benefit.

111. As a result of these Defendants conduct, and the wrongful conduct of each of them, EIN and KOKOWEEF, has suffered and continue to suffer economic losses and non-economic losses all in an amount according to proof at the time of trial. EIN and KOKOWEEF are also entitled to disgorgement of the monies improperly obtained by the Defendants.

### REQUEST AND PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Defendants as follows:

///

**PRAYER FOR RELIEF**


Plaintiffs pray for judgment and relief against Defendants as follows:

1. For damages according to proof;
2. For interest and all damages as allowed by the laws of the State of Nevada according to proof at the time of trial;
3. For a Temporary Restraining Order, permanent or temporary, prohibitory or mandatory injunction or writ of prohibition or mandamus;
4. For the removal of HAHN as a director of KOKOWEEF;
5. For the reinstatement of BURKE as a director and corporate secretary;
6. For the imposition of a civil penalty of not more than \$2,500 for a single violation or \$100,000 for multiple violations in a single proceeding or a series of related proceedings;
7. For the issuance of a declaratory judgment;
8. For an order of rescission and restitution to Plaintiffs;
9. For an order for an accounting;
10. For an order of punitive damages;
11. For the appointment of a receiver or conservator of the Defendants' assets;
12. For an order of payment of the Division's investigative costs;
13. For an order of such other relief as this Court deems just and proper;
14. For consideration paid for the securities and interest at the legal rate of Nevada from the date of payment, plus all expenses incurred, costs and reasonable attorneys' fees, plus the amount of income received on the securities.

DATED this 22<sup>nd</sup> day of September, 2008.

ROBERTSON & VICK, LLP

By:

  
ALEXANDER ROBERTSON, IV, Bar No. 8642  
JONATHAN S. VICK, Bar No. 8707  
JENNIFER L. TAYLOR, Bar No. 5798  
401 N. Buffalo Drive, Suite 202  
Las Vegas, Nevada 89145


*Attorneys for Plaintiffs*

ROBERTSON  
& VICK, LLP

1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

3 VERIFICATION

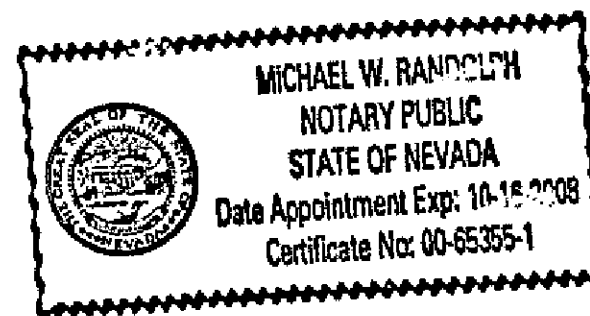
4 Under penalties of perjury, the undersigned declares that he is a Plaintiff named in the  
5 foregoing VERIFIED DERIVATIVE COMPLAINT and knows the contents thereof, that the  
6 pleading is true of his own knowledge, except as to those matters stated on information and  
7 belief, and that as to such matters he believes it to be true, and that during all relevant time  
8 periods referenced in the VERIFIED DERIVATIVE COMPLAINT, he held and continues to  
9 hold shares of Kokoweef, Inc., stock, and did hold shares of Explorations Incorporated of Nevada  
10 stock, which were exchanged for Kokoweef, Inc., shares of stock by the Plan of Reorganization  
11 of August 31, 2006.

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13   
14 TED R. BURKE

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16 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by TED  
17 R. BURKE.

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20 NOTARY PUBLIC

21 [seal]





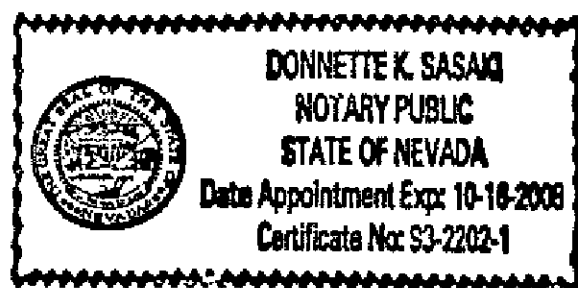
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2 COUNTY OF CLARK ) ss

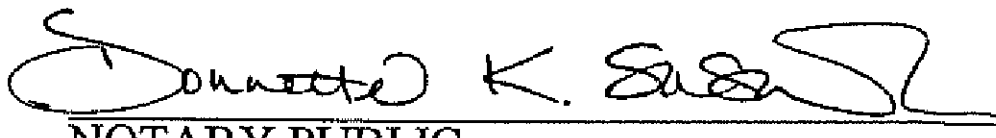
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11 of August 31, 2006.

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14 MICHAEL RANDOLPH

15 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by  
16 MICHAEL RANDOLPH.



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22 NOTARY PUBLIC

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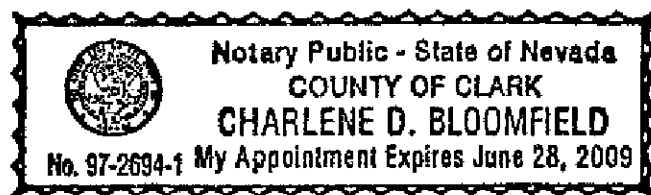
1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

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11 of August 31, 2006.

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13 \_\_\_\_\_  
14 JOHN BERTOLDO

15 SIGNED AND SWORN TO before me on this 19<sup>th</sup> day of September, 2008, by JOHN  
16 BERTOLDO.



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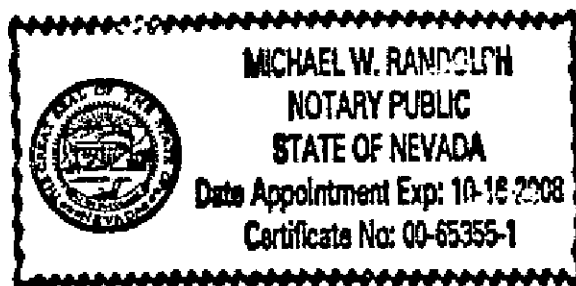
1 STATE OF NEVADA )  
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11 of August 31, 2006.

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13 Paula M. Barnard  
14 PAULA M. BARNARD

15 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by  
16 PAULA M. BARNARD.



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Michael W. Randolph  
NOTARY PUBLIC

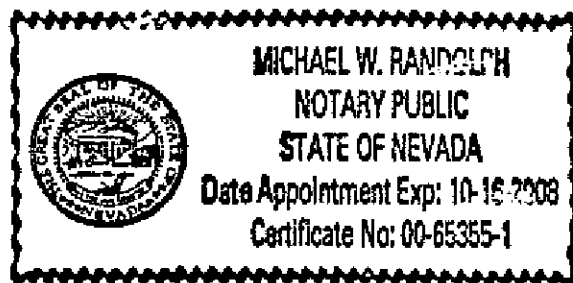
1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

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11 of August 31, 2006.

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13 Paul Barnard  
14 PAUL BARNARD

15 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by PAUL  
16 BARNARD.



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Michael W. Randolph  
NOTARY PUBLIC

[seal]

1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

3 VERIFICATION

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11 of August 31, 2006.

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13 C.A. Murff

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15 SIGNED AND SWORN TO before me on this 21 day of September, 2008, by  
16 C.A. Murff.



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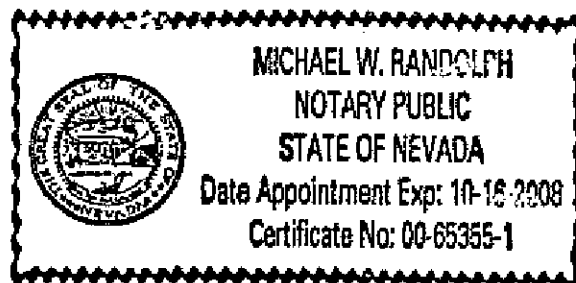
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2 COUNTY OF CLARK ) ss

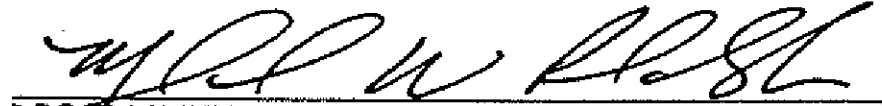
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11 of August 31, 2006.

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13   
14 LEON GOLDEN

15 SIGNED AND SWORN TO before me on this 21<sup>st</sup> day of September, 2008, by LEON  
16 GOLDEN.



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22 NOTARY PUBLIC  
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28 [seal]

1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

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13 Gerda Fern Billbe  
14 GERDA FERN BILLBE

15 SIGNED AND SWORN TO before me on this 21<sup>st</sup> day of September, 2008, by  
16 GERDA FERN BILLBE.



[seal]

28 Michael W. Randolph  
NOTARY PUBLIC

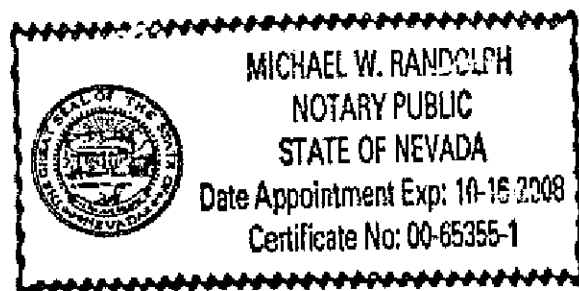
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14 STEVEN FRANKS

15 SIGNED AND SWORN TO before me on this 21<sup>st</sup> day of September, 2008, by  
16 STEVEN FRANKS.



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1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

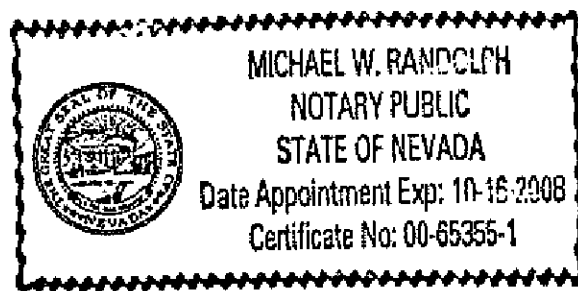
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11 of August 31, 2006.

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13   
JACKIE KRAVETZ

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15   
FRED KRAVETZ

16  
17 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by  
18 JACKIE KRAVETZ and FRED KRAVETZ.



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NOTARY PUBLIC

1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

3 VERIFICATION


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11 of August 31, 2006.

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13   
14 EDDY KRAVETZ

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16 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by EDDY  
KRAVETZ.



[seal]

  
NOTARY PUBLIC

1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

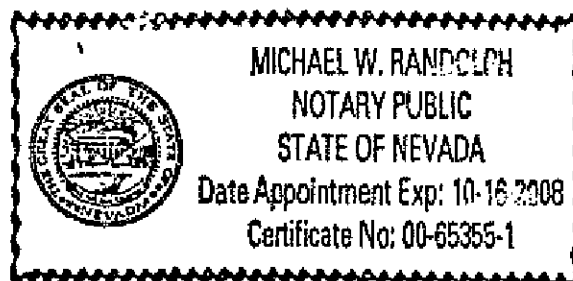
3 VERIFICATION

4 Under penalties of perjury, the undersigned declares that they are Plaintiffs named in the  
5 foregoing VERIFIED DERIVATIVE COMPLAINT and know the contents thereof, that the  
6 pleading is true of their own knowledge, except as to those matters stated on information and  
7 belief, and that as to such matters they believe it to be true, and that during all relevant time  
8 periods referenced in the VERIFIED DERIVATIVE COMPLAINT, they held and continue to  
9 hold shares of Kokoweef, Inc., stock, and did hold shares of Explorations Incorporated of Nevada  
10 stock, which were exchanged for Kokoweef, Inc., shares of stock by the Plan of Reorganization  
11 of August 31, 2006.

12  
13 Bob Treska  
14 BOB TRESKA

15 Robyn L. Treska  
16 ROBYN TRESKA

17  
18 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by BOB  
TRESKA and ROBYN TRESKA.



[seal]

23  
24  
25  
26  
27  
28 Michael W. Randolph  
NOTARY PUBLIC

1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

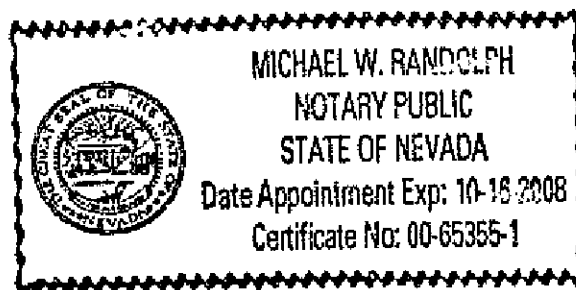
3 VERIFICATION

4 Under penalties of perjury, the undersigned declares that they are Plaintiffs named in the  
5 foregoing VERIFIED DERIVATIVE COMPLAINT and know the contents thereof, that the  
6 pleading is true of their own knowledge, except as to those matters stated on information and  
7 belief, and that as to such matters they believe it to be true, and that during all relevant time  
8 periods referenced in the VERIFIED DERIVATIVE COMPLAINT, they held and continue to  
9 hold shares of Kokoweef, Inc., stock, and did hold shares of Explorations Incorporated of Nevada  
10 stock, which were exchanged for Kokoweef, Inc., shares of stock by the Plan of Reorganization  
11 of August 31, 2006.

12  
13 Michael R. Kehoe  
14 MICHAEL R. KEHOE

15 Lauretta L. Kehoe  
16 LAURETTA L. KEHOE

17  
18 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by  
MICHAEL R. KEHOE and LAURETTA L. KEHOE.



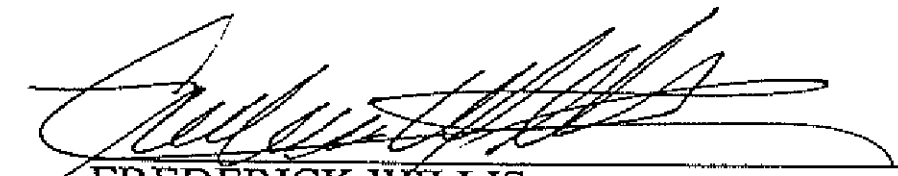
[seal]

Michael W. Randolph  
NOTARY PUBLIC

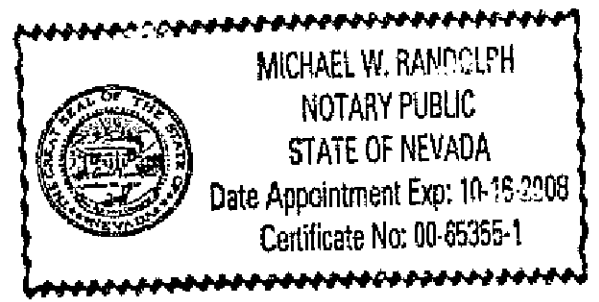
1 STATE OF NEVADA )  
2 COUNTY OF CLARK ) ss

3 VERIFICATION

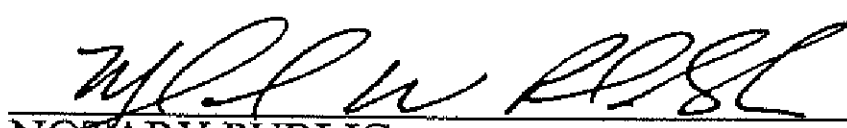
4 Under penalties of perjury, the undersigned declares that he is a Plaintiff named in the  
5 foregoing VERIFIED DERIVATIVE COMPLAINT and knows the contents thereof, that the  
6 pleading is true of his own knowledge, except as to those matters stated on information and  
7 belief, and that as to such matters he believes it to be true, and that during all relevant time  
8 periods referenced in the VERIFIED DERIVATIVE COMPLAINT, he held and continues to  
9 hold shares of Kokoweef, Inc., stock, and did hold shares of Explorations Incorporated of Nevada  
10 stock, which were exchanged for Kokoweef, Inc., shares of stock by the Plan of Reorganization  
11 of August 31, 2006.

12  
13   
14 FREDERICK WILLIS

15 SIGNED AND SWORN TO before me on this 22 day of September, 2008, by  
16 FREDERICK WILLIS.



20 [seal]

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23 NOTARY PUBLIC  
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