

DISTRICT COURT, BOULDER COUNTY,
STATE OF COLORADO

1777 6th Street
Boulder, Colorado 80302
(303) 441-3750

Plaintiff: Hepburn Ingham

Defendants: Todd D. Burke and Kirstin
Burke

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Case No. 2004CV570

Division: 5

SUPPLEMENTAL AFFIDAVIT OF HEPBURN INGHAM

I, Hepburn Ingham, being of lawful age, being first duly sworn according to law,
upon oath, depose and state:

1. I affirm the allegations stated in the Verified Complaint.

2. As a result of his wrongful acts set forth in detail in the Verified
Complaint, Defendant Todd Burke ("Burke") is liable to me in the following amounts as of July
23, 2004:

Amount paid for stock May 1, 2000

Principal	\$ 100,000.00
Interest from May 1, 2000 – July 23, 2004 ¹	\$ 38,547.06

Loan of November 16, 2000

Principal	\$ 150,000.00
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¹ All interest calculations are based on a rate of 8%, compounded annually.

Interest from Nov. 16, 2000 – March 15, 2003.....	\$ 29,561.69
Payment from Burke of March 15, 2003	\$ (30,000.00)
Interest on remaining amount due from March 15, 2003 – July 23, 2004.....	\$ 16,566.94
<u>Amount paid for stock February 21, 2001</u>	
Principal	\$ 150,000.00
Interest from Feb. 21, 2001 – July 23, 2004	\$ 45,317.00
<u>Loan of March 30, 2002</u>	
Principal	\$ 100,000.00
Interest from Mar. 30, 2002 – July 23, 2004.....	\$ 19,605.53
<u>Loan of December 30, 2002</u>	
Principal	\$ 65,000.00
Interest from Dec. 30, 2002 – July 23, 2004.....	\$ 8,375.38
Total of Amounts Due	
	\$ 692,973.60

3. A true and correct copy of the stock certificate resulting from my May 1, 2000 purchase of 80,000 shares of globalTowers, Inc. (“GTI”) stock is attached hereto as **Exhibit A**.

4. The loan I made to GTI dated November 16, 2000 was documented in the form of a convertible promissory note, a true and correct copy of which is attached hereto as **Exhibit B**. I do not have possession of the original convertible promissory note.

5. A true and correct copy of the stock purchase agreement evidencing my February 21, 2001 purchase from Burke of 75,000 shares of GTI stock for the sum of \$150,000.00 is attached hereto as **Exhibit C**. Burke has failed and refused to provide me with a corresponding GTI stock certificate.

6. The final two loans that I made to Burke in the amounts of \$100,000.00 and \$65,000.00, dated March 30, 2002 and December 30, 2002, respectively, were not documented with written promissory notes. True and correct copies of my credit union account statements evidencing wire transfers in the amounts of \$100,000.00 and \$65,000.00, dated April 1, 2002 and December 31, 2002, respectively, are attached hereto as **Exhibits D and E**. I wired these funds to Burke to make the aforementioned loans.

7. On or about June 23, 2003, the \$150,000.00 GTI convertible promissory note was converted to a \$100,000.00 promissory note from GTI in favor of Ingham, backdated to November 15, 2001, and 31,750 shares of GTI stock. True and correct copies of the resulting new \$100,000.00 promissory note and stock certificate are attached hereto as **Exhibit F**.



 Hepburn Ingham

STATE OF CALIFORNIA

COUNTY OF San Bernardino)
) ss.

I hereby declare that Hephum Ingham appeared before me this 31st
day of August, 2004, and declared severally that he executed the foregoing
document as his free act and that the statements contained therein are true and correct to the best
of his knowledge and belief.

Witness my hand and official seal.

My Commission expires: 5/4/08

[seal]

V. Matjevich
Notary Public

