

EXHIBIT A

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

AUDIENCE OF ONE PRODUCTIONS, LLC,)	
)	
Plaintiff,)	
v.)	Civil Action No. 3:16-cv-795
)	
IMPACT VENTURES, LLC f/k/a TNA)	
ENTERTAINMENT, LLC; DEAN)	
BROADHEAD; RONALD DEAN HARRIS;)	
and AROLUXE, LLC d/b/a AROLUXE)	
MARKETING,)	
)	
Defendants.)	
)	

AFFIDAVIT OF RONALD DEAN HARRIS

The undersigned, Ronald Dean Harris, being first duly sworn, deposes as follows:

1. My name is Ron Harris. I am an adult citizen of the State of Tennessee; my address is [REDACTED] Tennessee 37067.

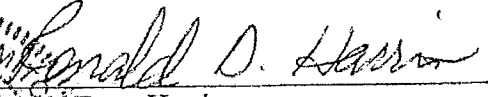
2. At all times relevant to the Complaint, I was not employed by Defendant Impact Ventures, LLC f/k/a TNA Entertainment, LLC ("TNA"). My last employment with TNA was almost ten years ago.

3. At all times relevant to the Complaint, I was not employed by Defendant Aroluxe, LLC d/b/a Aroluxe Marketing ("Aroluxe"). I am not, nor have I ever been, authorized to act on behalf of Aroluxe. Nor am I a principal of Aroluxe.

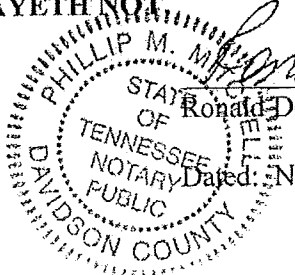
4. Based on my review of the Complaint, I understand that there was an agreement between Plaintiff Audience of One Productions, LLC ("Plaintiff") and TNA. I am not a party to this agreement or any agreement discussed in the Complaint.

5. I did not travel to the Commonwealth of Virginia at any time relevant to the Complaint.

FURTHER AFFIANT SAYETH NOT



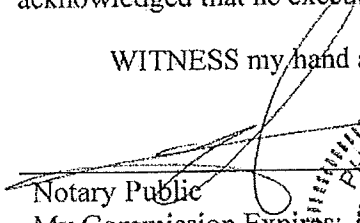
 Ronald Dean Harris
 Dated: November 30, 2016



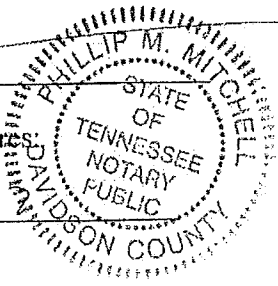
STATE OF TENNESSEE
COUNTY OF Davidson

Personally appeared before me, Phillip Mitchell, a Notary Public in and for said State and County, **Ronald D. Harris**, the aforementioned Affiant, with whom I am personally acquainted (or who was proved to me on the basis of satisfactory evidence), and who acknowledged that he executed the foregoing instrument for the purposes therein contained.

WITNESS my hand and seal at office, on this 30 day of November, 2016.



 Notary Public
 My Commission Expires: 5-8-17



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 30th day of November, 2016, a copy of the foregoing **AFFIDAVIT OF RONALD HARRIS** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail, first-class postage prepaid. Parties may access this filing through the Court's electronic filing system.

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/s/ Mark A. Fulks

Mark A. Fulks