EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	**2:18-CR-166-KOB-JEO**
	)	
DONALD V. WATKINS, SR., and	)	
DONALD V. WATKINS, JR.	)	

DECLARATION OF OLAYINKA O. AROWOLO

I, Olayinka Arowolo, declare under penalty of perjury, pursuant to the laws of Namibia and 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Olayinka O. Arowolo. I am a citizen of the Federal Republic of Nigeria and a permanent resident of the Republic of Namibia. I live and work in Windhoek, Namibia. I am 39-years-old. I am under no legal disability and I make this declaration voluntarily and based upon my personal knowledge of the facts contained herein.
2. I am making this declaration in support of Mr. Donald V. Watkins' request for a non-guideline sentence in connection with the March 8, 2019 jury verdicts in favor of the U.S. Government and against Mr. Watkins on 10 Counts of conspiracy, wire fraud, and bank fraud charges.

Professional Background and Experience

3. I am the Chief Executive Officer of Nabirm Energy Services (Pty) Ltd ("Nabirm") (www.nabirm.com), a Windhoek, Namibian-based oil and gas company in which I am one of five shareholders.

4. I attained a Master of Business Administration and Finance from Clark Atlanta University in Atlanta, Georgia in 2015. I earned a Bachelor of Science, Computer Information Systems from Clark Atlanta University in 2003.
5. As chief executive officer of Nabirm, I initiated the application process for Oil Block 2113A, Petroleum Exploration License ("PEL") 0058, in the Walvis Basin off the west coast of Namibia.
6. I also negotiated a competitive Petroleum Agreement with the Government of the Republic of Namibia, via the Ministry of Mines & Energy. I also developed a strategic partnership, including the execution of a controlling Joint Operating Agreement (JOA) with the National Petroleum Corporation of Namibia (NAMCOR), in a bid to further mitigate Nabirm's flagship asset from political risk.
7. I also developed a strategic partnership with London-based investment bank Daniel Stewart & Company to produce a Research Note for investors in a bid to raise investment capital as a hedge against long-term liquidity risks.
8. I raised capital for initial desktop studies and for Nabirm's subsequent 2D (two-dimensional) seismic geotechnical work program and data analysis.
9. I also developed the internal risk management system via codified policies, procedures and information technology management systems. Additionally, I led the team that implemented the logistical planning and specialized strategy for Nabirm's 2D seismic work program.
10. Working with Mr. Watkins, I built Nabirm's brand as a recognized global operator with an asset in the Walvis Basin that is being developed off the coast of Namibia,

alongside international oil companies like ExxonMobil, Tullow, Royal Dutch Shell, Maurel Prom, Galp Energia, Eco Atlantic, ONGC Videsh and Pan-Continental.

Nabirm's Ownership Structure and Assets

11. Nabirm Energy Service's Registration Number at the Namibian Ministry of Trade and Industry is: 2011/0207. The company was incorporated on August 25, 2011.
12. Nabirm's shareholding group consists of three African-based shareholders (i.e., GRAFFI DBA Investment Holdings, (PTY) LTD – 35%; Nabirm Oil & Gas (PTY) LTD – 10%; and Olayinka Arowolo – 11.5%) and two African-Americans (i.e., Donald V. Watkins – 21.5% and Alfred Seawright – 22%).
13. Nabirm's journey began when I brought this business opportunity to Mr. Watkins in late August 2011. Mr. Watkins introduced it to Dr. Alfred Seawright, a close friend of his who owns a highly successful medical equipment supply business in Montgomery, Alabama.
14. In 2012, Mr. Watkins used his relationship with a senior executive for ExxonMobil's African operations to assess Nabirm's Oil Block 2113A for its potential commercial viability. This executive encouraged Nabirm to pursue oil exploration and development activities within Block 2113A.
15. In 2014, GRAFFI, which is an African-based company led by two Cameroon businessmen, joined Nabirm's shareholding group and provided Nabirm Energy Services with the capital and technical expertise needed to undertake and complete the company's 2D seismic work program. From there, we kept Nabirm's development activities moving forward and implemented the company's business plan.

16. In October 2015, Houston, Texas-based ION Geophysics published the technical analysis on Nabirm's 2D seismic data for Oil Block 2113A. ION is one of the leading analytical firms in the world for seismic data interpretation and analysis. Its report confirmed the presence of 522 million barrels of "unrisked" recoverable oil resources and 583 billion cubic feet of "unrisked" methane gas within two oil pockets, or "leads", in Oil Block 2113A.

17. Nabirm is following the same geotechnical work program as ExxonMobil in the same Walvis Basin to develop, extract and commercialize this oil find.

18. Nabirm Energy Services has already scoped and defined a 3D (three-dimensional) seismic geotechnical work contract and is negotiating pricing with a Norwegian geotechnical firm to conduct the required 3D work. This scope of work will (a) further define the volume of oil in the recoverable resources and (b) guide Nabirm in selecting the best locations for test wells.

19. In developing Nabirm and implementing its business plan, Mr. Watkins provided all of the corporate legal services Nabirm needed while deferring the payment of his attorney's fees and reimbursement of his expenses during the exploration and development phases of the business. To date, Mr. Watkins' unbilled legal services for an 8-year period exceed $1 million USD at his customary billing rate of $800 per hour.

20. Nabirm's shareholding group has also been able to self-fund the substantial fees required in connection with the company's two consecutive license renewal applications.

21. Today, Nabirm's five shareholders still own 100% of our oil and gas company, free and clear of encumbrances.

The Watkins-Barkley Transaction

22. In 2012, Mr. Watkins sold a defined portion of his economic interest in Nabirm Energy Services to Mr. Charles Barkley. Mr. Watkins was authorized to execute such a sales transaction under the Operating Agreement for Nabirm Global, LLC., which is the U.S.-based parent company of Nabirm Energy Services. The proceeds of this sales transaction belonged to Mr. Watkins, as he diluted his economic interest in Nabirm to include Mr. Barkley.

23. Mr. Barkley is not a shareholder in Nabirm Global or Nabirm Energy Services. Instead, he will share, on an irrevocable basis, in any economic distribution Mr. Watkins receives by virtue of his ownership interest in Nabirm Energy Services.

24. As I mentioned earlier, the ION report (at page 43) confirms a presence of 522 million barrels of "unrisked" recoverable oil resources. Mr. Watkins owns 21.5% (or 101 million barrels) of Nabirm's 90% portion of this oil find. The Namibian national government owns a 10% interest in this oil. Mr. Barkley owns a 20% economic interest (or 20.2 million barrels) in Mr. Watkins' allocation of the oil find within Block 2113A.

25. Brent quality oil, which is what was found within Block 2113A, is trading at today's spot price of $57 USD per barrel. It typically takes approximately $15 per barrel to extract and commercialize the oil within an oil block with the geotechnical properties present in Block 2113A.

26. Based upon (a) any pricing metric above $40 USD per barrel, (b) Nabirm's successful completion of its 3D seismic work, (c) the drilling of spudding test wells, and (d) Nabirm's successful commercial extraction of 20% to 50% of the oil present

in Block 2113A, the value of Mr. Barkley's economic interest in Mr. Watkins' equity portion of Nabirm will vastly exceed his $2 million economic participation purchase price.

Nabirm's History in the Uranium Exploration Business

27. On March 27, 2012, Nabirm Global, LLC, made history when the company was awarded a uranium concession by Epangelo Mining Company (Pty) Ltd., which is the Republic of Namibia's national mining company.

28. The Namibian government lifted a national moratorium on uranium concessions for nuclear fuels so that Nabirm could compete for this concession against Iran's state-owned Iranian Foreign Investment Company and others.

29. Nabirm worked closely with the U.S. State Department to make sure that the company had the best chance of winning this uranium concession. Our success in winning the concession kept this strategic asset out of the hands of the Iranians at a time when they were desperately trying to develop a nuclear weapons program.

A "Minnow" in a Sea Full of Giant International Oil and Gas Companies

30. On January 16, 2015, *Upstream* magazine published an article about the completion of Nabirm's 2D geotechnical work program. *Upstream* is a UK-based trade magazine for the global oil and gas industry. According to the article, nobody in the industry thought Nabirm could get its 2D seismic work done without turning to the major oil companies for outside financing. They were wrong.

31. The *Upstream* article called Nabirm a "minnow" and said, "Neither Arowolo nor Watkins has a background in the upstream oil and gas world, although they are supported by a technical team of four people."

32. Nabirm is now preparing for its 3D phase of petroleum development activities, followed by data analyses and the drilling of test wells. Nabirm is the only private, African/African-American-owned oil and gas company that is developing a confirmed "unrisked" recoverable oil resource in the Walvis Basin for commercial extraction.

33. Nabirm is working in the same Basin alongside of several publicly traded international energy companies. These include: (a) ExxonMobil; (b) UK-based Tullow Oil; (c) Maurel Prom, a publicly traded oil company; (d) London-based Chariot Oil and Gas; (e) ONGC Videsh, Ltd., which is India's state-owned petroleum company; (f) Madrid-based Repsol, (g) Total, a French oil conglomerate, and (h) Royal Dutch Shell.

34. It has been a privilege to make this history journey in the oil and gas industry with Mr. Watkins and my other shareholders. I am proud of what Nabirm has been able to achieve against all odds. None of it would have been possible without Mr. Watkins' dedication of his time, money, and professional services as an attorney since 2011. Never have so few shareholders accomplished so much in the offshore oil and gas industry with such few resources.

35. Finally, I am firmly convinced that Nabirm will successfully reach its final destination in this long and difficult journey. We will break the color barrier in the global oil and gas industry by becoming the first and only African/African-American-owned oil and gas company to operate commercial-scale oil and gas wells. We are working every day to make that happen.

I make this DECLARATION under penalty of perjury, pursuant to the laws of Namibia and 28 U.S.C. § 1746 and based upon my personal knowledge of its contents. To the best of my knowledge, everything contained in this DECLARATION is true and correct.

Done this 4th day of July 2019.

Olayinka O. Arowolo

Corporate Seal:

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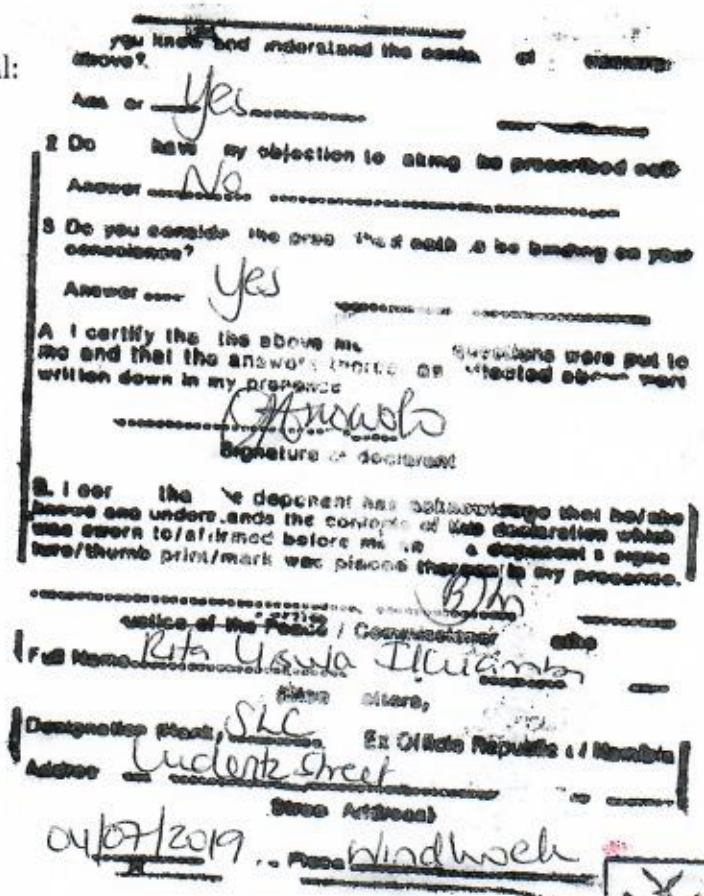
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