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A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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LONDON
(A LONDON-BASED
MULTINATIONAL PARTNERSHIP)
PARIS
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JOHANNESBURG
(PTY) LTD.
MOSCOW
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(AFFILIATED OFFICE)
BISHKEK
ALMATY
BEIJING

May 17, 2005

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc.
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

RECEIVED

MAY 17 2005

Federal Communications Commission
Office of Secretary

**Re: eLandia Technologies, Inc.
Petition for Declaratory Ruling – Section 310(b)(4)
ISP-PDR- 20050321-00005**

Dear Ms. Dortch:

Transmitted herewith, on behalf of eLandia Technologies, Inc. ("eLandia Technologies"), are an original and four (4) copies of Attachments A, B and C to be associated with the above referenced Petition for Declaratory Ruling. These attachments identify the shareholders of eLandia Solutions, Inc., the 100 percent owner of eLandia Technologies, and contain relevant location and citizenship information for such shareholders.

Please contact the undersigned with any questions.

Sincerely,



Richard Rubin
Counsel to eLandia Technologies, Inc.

cc: Francis Gutierrez (w/encl.)

314000v1

ATTACHMENT A

ATTACHMENT B

ATTACHMENT C

Total Shares in eLandia Solutions, Inc. 9,700,000 shares

Attachment A (Non-U.S. Citizen) 5,791,668 shares*
Attachment B (U.S. Citizens) 3,708,332 shares**
Attachment C (Presumed U.S. Citizens) 200,000 shares***

Largest eLandia Solutions, Inc. shareholder in each category

- * *Stanford International Bank Limited will hold 59.71% of eLandia Solutions, Inc.*
- ** *Sidney Camper and E d Crowston will each hold 9.63% of eLandia Solutions, Inc.*
- *** *Ascot Gardens Capital LC will hold .77% of eLandia Solutions, Inc.*

Shareholders of eLandia Solutions, Inc.

eLandia Technologies, Inc.
File No. ISP-PDR-20050321-00005
Attachment A

The following shareholder will hold 5,791,668 shares which constitute approximately 59.71% of eLandia Solutions. This shareholder is not a United States citizen (see Petition for Declaratory Ruling).	
Name and Address	# Shares of Stock
Stanford International Bank Limited*	5,791,668
Houston, Texas 77056	
*These shares are currently held by Stanford Venture Capital Holdings, a United States corporation. Both the current shareholder and the proposed shareholder are 100% owned by R. Allen Stanford, a U.S. citizen (see Petition for Declaratory Ruling).	
Subtotal	5,791,668

Shareholders of eLandia Solutions, Inc.

eLandia Technologies, Inc.
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Attachment B

The following shareholders will hold 3,708,332 shares which constitute approximately 38.23% of eLandia Solutions. All are United States citizens.	
Name and Address	# Shares of Stock
Osvaldo Pi	289,583
Miami, Florida 33131	
Daniel Bogar	289,583
Miami, Florida 33131	
Ronald M. Stein	289,583
Miami, Florida 33133	
William Fusselman	289,583
Miami, Florida 33133	
American Capital Ventures, Inc.	300,000
Aventura, Florida 333180	
Larry Barnes	5,625
Alpharetta, Georgia 30022	
Phil Belanger	33,750
Fort Lauderdale, Florida 33316	
Charlie Brown	56,250
Columbia, South Carolina 29169	
Sdney Camper	933,750
Fort Lauderdale, Florida 33316	
Ed Crowston	933,750
Fort Lauderdale, Florida 33316	
H. David Fanning	225,000
Apollo Beach, Florida 33572	
Richard Gebhard	5,625
San Jose, California 95124	
Glen E. Goldberg	11,250
Fort Lauderdale, Florida 33316	
Bobby Holcombe	5,625
Fort Lauderdale, Florida 33316	
Edwin Martin	5,625
Cumming, Georgia 30041	
James O'Connor	5,625
Sterling, Virginia 20165	

Shareholders of eLandia Solutions, Inc.

eLandia Technologies, Inc.
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Attachment B

Name and Address	# Shares of Stock
Martin Pedata	22,500
Deland, Florida 32724	
Tom Sellers	5,625
Suwannee, Georgia 30024	
Subtotal	3,708,332

Shareholders of eLandia Solutions, Inc.

eLandia Technologies, Inc.
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Attachment C

The following shareholders, holding in the aggregate, 200,000 shares or approximately 2.06% of eLandia Solutions, are shareholders as a result of a bankruptcy of an affiliate. Their citizenship is presumed to be United States.	
Name and Address	# Shares of Stock
A & A Equipment, Inc. Siloam Springs, AR 72761	22
Adtech, Inc. Wayne, OK 73095	795
Advantage Funding Corporation Atlanta, GA 30339	105
AEL Uniondale, NY 11555	868
Agricredit Acceptance LLC Des Moines, IA 50322-9402	135
Airworks Springdale, AR 72765-1760	41
Akerman Senterfitt Orlando, FL 32802-4906	1,030
Alma Tractor & Equipment Alma, AR 72956	20
American Augers Inc. West Salem, OH 44287	26
American Express Travel Related Svcs Co., Inc. BECKET AND LEE LLP, ATTORNEYS/AGENT Malvern, PA 19355-0701	465
Arkansas Dept. of Finance and Admin. Little Rock, AR 72203	214 347
Arkansas Mobile Accessories Springdale, AR 72766-6220	43
Arkansas National Bank Springdale, AR 72766	121
Arkansas National Bank Bentonville, AR 72712	37

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eLandia Technologies, Inc.
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Name and Address	# Shares of Stock
Arkansas Western Gas	100
Fayetteville, AR 72703-1002	
Arkie Directional Boring	253
Elkins, AR 72727	
Arkona Machine Shop, Inc.	43
P.O. Box 6055	
Fort Smith, AR 72906	
Ascot Gardens Capital, LLC*	74,531
Coconut Creek, FL 33073	
AT&T Wireless	208
Aurora, IL 60572-8228	
AT&T Wireless	51
Phoenix, AZ 85062-8254	
A T & T Wireless	255
Portland, OR 97207-0309	
Athletic World Advertising	24
Fayetteville, AR 72703	
Baker Hughes Mining Tools	70
Houston, TX 77210-4740	
Banner Sign & Barricade Inc.	27
Little Rock, AR 72216	
Barrows Excavation, Inc.	2,700
Berryville, AR 72616-8813	
Basic Rental Inc	22
Athens, TX 75751	
Benchmark Directional Services	24
Lafayette, LA 70505-3666	
Blackmax Downhole Tools Ltd	147
Stafford, TX 77477-3111	
Bluff City Electronics	72
Memphis, TN 38116	

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Name and Address	# Shares of Stock
BMW	95
Phoenix, AZ 85011	
BMW Financial Services NA, LLC	389
Dublin, OH 43017	
Bore Master, Inc.	307
Maitland, FL 32794	
Bumper to Bumper	59
Springdale, AR 72764	
C.J.L., Inc. of Texas	897
Lindale, TX 75771	
Central U.S., Inc	419
Goshen, AR 72735	
Central US Underground	121
Goshen, AR 72735	
Century Tel Damages	54
Russellville, AR 72811	
CenturyTel of Northwest Arkansas, LLC	243
Baton Rouge, LA 70806	
Chad Matthis	7
Marshall, AR 72650	
Citi Factors Financial Group, Inc	307
c/o EULER/ American Credit Indemnity	
Baltimore, MD 21202	
Citibank USA, N.A.	96
Des Moines, IA 50368	
CitiCapital	220
Carol Stream, IL 60197-6229	
CitiCorp Del-Lease	149
Philadelphia, PA 19170-7878	
CitiCorp Del-Lease	40
Philadelphia, PA 19170-7878	
.Com Communications	610
Greenville, NC 27858	

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Name and Address	# Shares of Stock
Commscope	612
Charlotte, NC 28260-0600	
Community Phonebook	83
Santa Ana, CA 92799-1248	
Consolidated Electrical Dist.	27
Mission, KS 66201	
Continental Adj Bureau, Inc.	28
Kansas City, MO 64133	
Cooper Family Medicine PA	76
Springdale, AR 72764	
Corporation Service Company	198
Philadelphia, PA 19101-3397	
Croy Well Pointing Corp.	43
Oldsmar, FL 34677	
CT Corporation System	60
Carol Stream, IL 60197-4349	
Curtis Jenkins	40
West Fork, AR 72774	
Custom Equipment Co.	59
Fort Smith, AR 72908	
D & G Sales	59
Lowell, AR 72745	
D & J Construction	177
Mountain Pine, AR 71956	
D.G. & Sons	190
Jessieville, AR 71949	
Daimler Chrysler	348
Husch & Eppenberger, LLC	
Trustee Payment	
Detroit, MI 48255-1003	
Daniel McCormick CPA	41
Fayetteville, AR 72701	
DanRik Construction, Inc	897
c/o Stanley B. Blackstone, APLC	
Lafayette, LA 70503	

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Name and Address	# Shares of Stock
Darrell Graves	544
d/b/a D.J. Construction	
Jessieville, AR 71949	
Daryl Boykin Wood	199
Smyrna, GA 30082	
Data National	74
Dallas, TX 75374	
Davis, Matthews & Quigley, PC	97
Atlanta, GA 30326	
DC Financial Services	19
Redwood Falls, MN 56283-0439	
Delta Dental	62
Sherwood, AR 72120	
Dennis True	343
Magnolia, TX 77355	
Department of the Treasury	2,353
Little Rock, AR 72201	1,222
	14,239
Directional Drilling Specialis	42
Malvern, AR 72104	
Diversified Directional Boring	204
Hayden, ID 83835	
Diversified Financial Service	207
Saint Louis, MO 63141	
Drive Train Specialists LLC	55
Springdale, AR 72762	
E & E Parts & Equipment	41
Springdale, AR 72764	
Eagle Body	24
Siloam Springs, AR 72761	
eLandia Solutions Corp.	74,531
Ft. Lauderdale, FL 33316	
Farmers Cooperative	25
Van Buren, AR 72957	

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Name and Address	# Shares of Stock
Federal Express	221
Memphis, TN 38101-1140	
Fiber Solutions Telecommunications Corp	221
Fairfax, VA 22033-3940	
First Security Bank	251
Fayetteville, AR 72702-1246	
Fochtman Enterprises	25
Fayetteville, AR 72702	
Ford Credit	18
Kansas City, MO 64121-9825	
Fuels & Supplies, Inc.	136
Springdale, AR 72765	
Gary M. Fuchs	1,061
Fayetteville, AR 72702	1,504
Gearhart Rockbit International	200
Fort Worth, TX 76140	
Ginny Otterstein	23
Laramie, WY 82070	
Gracian, Carlos & Millie	103
Fayetteville, AR 72701	
GTS	592
Larry Garriott, Dennis Trew, Randy Strickland	
Tonitown, AR 72762	
H & E Equipment Services, LLC	34
Baton Rouge, LA 70816	
H & H Directional Boring	2,991
Fayetteville, AR 72701	
H & L Contracting, Inc.	1,518
Fort Smith, AR 72903	
Harmon Auto Glass	19
Chicago, IL 60694-4843	
Head & Enquist	34
Baton Rouge, LA 70816	

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Name and Address	# Shares of Stock
Hertz Equipment Rental	109
Springdale, AR 72762	
Hertz Equipment Rental Corp.	56
Oklahoma City, OK 73126-0360	
Horizontal Inspection Tech	46
Youngsville, LA 70592	
Howard & Irma Boudrey	43
Fayetteville, AR 72701	
HSI Fusion Services, Inc.	353
Lakeland, FL 33807	
Hughes Supply Inc	65
Dallas, TX 75395-1297	
Hughes Supply Inc	369
c/o Rameela Chandraseka	
Orlando, FL 32805	
Hydro-Spec, Inc.	186
Springdale, AR 72765	
Irwin Business Finance	91
Indianapolis, IN 46206-6214	
J.J. Keller & Associates, Inc.	28
Neenah, WI 54957	
J. Johnson Construction Co.	545
Rogers, AR 72756	
Jackson Walker LLP	72
Austin, TX 78701	
K & M Products	21
Franklin, NC 28744	
Kevin Taylor	28
Bartlesville, OK 74003	
L & B Investments	183
Springdale, AR 72764	
Larry Otterstein	218
Laramie, WY 82070	

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Name and Address	# Shares of Stock
Lee and Mary Capwell	1,403
Fayetteville, AR 72704	4,436
Lewis Ford Sales, Inc/Lewis Chrysler Inc	110
Fayetteville, AR 72703-0008	
Lin Bao	388
Randolph, NJ 07869	
Lipsmeyer Directional Boring	354
Denham Springs, LA 70726	
Locke Wholesale Electric Suppl	19
Oklahoma City, OK 73124-0980	
Lone Star	27
Hindsville, AR 72738	
Madison Bank and Trust for	75
Huntsville, AR 72740	
Marcum & Kliegman	1,853
New York, NY 10017	
Master of Diaster Plumbing	28
Springdale, AR 72762	
McGuire Woods	3,295
Richmond, VA 23286-0645	
McMullen Oil Company, Inc.	62
Clearwater, FL 33762	
Michael and Amanda Hathorn	52
Huntsville, AR 72740	431
Mike L Smith	1,403
c/o Stanley Bond, Attorney	4,436
Fayetteville, AR 72702	
Mike Salazar	46
Fayetteville, AR 72703	
Mike Smith	151
West Fork, AR 72774	
Millie Gracian	103
Fayetteville, AR 72701	

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Name and Address	# Shares of Stock
Missouri Department of Revenue	509
Jefferson City, MO 65105	28
National Home Centers, Inc.	29
Springdale, AR 72764	
Nelson Utility	162
Concord, AR 72523	
New Dixie Sheet Metal	237
Conway, AR 72033	
New Holland	360
Carol Stream, IL 60132-0507	
Nextel Communications	173
Carol Stream, IL 60197-4191	
Nichter Contracting Corp.	28
Tampa, FL 33622	
Noel Leirer	43
Rogers, AR 72758	
Northwest Arkansas Truck	57
Springdale, AR 72765-0089	
Northwest Tire Service	352
Springdale, AR 72765	
Novasys Health Network	276
Little Rock, AR 72210	
O'Reilly Auto Parts	27
Kansas City, MO 64180-2732	
Oklahoma Tax Commission	98
Bankruptcy Section	
Oklahoma City, OK 73152-3248	
Ozark Steel	19
Fayetteville, AR 72702-1167	
Patriot Telcom Supply	483
Dallas, TX 75234	
Peachtree Geographics	230
Marietta, GA 30062	

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Name and Address	# Shares of Stock
Pittsburgh Pipe	242
Saint Louis, MO 63147	
Pro-Comm Inground Service	433
Van Buren, AR 72956	
Randall Thomas	91
Oklahoma City, OK 73170	
Razorback Boars	189
Jessieville, AR 71949	
Reitler Brown LLC	9,256
c/o Stanley V Bond	
Fayetteville, AR 72702-1893	
Remax Real Estate Centre	46
Jonesboro, AR 72401	
Rental Service Corporation	18
Mpls, MN 55447	
RGA	39
Little Rock, AR 72219	
Rite-Flo Supply, Inc.	100
Tampa, FL 33684	
River Valley Winwater Works Co	271
Barling, AR 72923	
RockBit International Management, Inc	200
c/o Cantey & Hanger, LLP	
Forth Worth, TX 76102-2863	
Rogers Water Utilities	118
Rogers, AR 72757	
Ronald Moore	72
Estelline, SD 57234	
Ross Irrigation	378
De Witt, AR 72042	
Roy Greenway Trucking/All	57
Crane, MO 65633	
Roy Patrick	43
Springdale, AR 72764	

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Name and Address	# Shares of Stock
SBC Communications	48
c/o SBC Southwestern Bell	34
West Sacramento, CA 95798	99
	71
Scott Cable Communications Inc.	594
Farmingdale, NY 11735	
Scott Financial Services	762
c/o Agricredit Acceptance, LLC	
Urbandale, IA 50322-9402	
SCS, Ltd.	58
O Fallon, MO 63366	
Sharewell, LP	1,558
Houston, TX 77001	
Sixty Two Auto Salvage	20
Fayetteville, AR 72701	
Skeets Electric, Inc.	24
Springdale, AR 72765	
Software Solutions, LLC	61
Little Rock, AR 72211	
Southwestern Bell	28
Kansas City, MO 64133	
Southwestern Bell Telephone Co	38
Saint Louis, MO 63101-3099	
Steven White	405
Cumming, GA 30041	
Bryan Stover	24
West Fork, AR 72774	
Subsurface Operations	215
Oklahoma City, OK 73189-0356	
Suncom	191
Oklahoma City, OK 73189-0356	
TCI, Inc.	7,940
Canehill, AR 72717	
Telectric	287
Pineville, LA 71360	

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Name and Address	# Shares of Stock
The CIT Group Los Angeles, CA 90074-5603	914
The Tool Crib, Inc. Springdale, AR 72762	22
Tim Patrick Goshen, AR 72735	69
Times Publishing Company Saint Petersburg, FL 33731-0175	21
Tower Systems, Inc. Watertown, SD 57201	318
Tractor Supply Des Moines, IA 50368-9020	104
Triflo International Inc. Conroe, TX 77305	20
Truck Pro, Inc Atlanta, GA 30353-8189	132
Truck Pro, Inc Cordova, TN 38088	124
True Environmental Service Magnolia, TX 77355	1,420
True Underground Eaton, CO 80615	1,232
Tulco Oils, Inc. Tulsa, OK 74115	43
U of A Treasurer's Office Fayetteville, AR 72702-1404	53
Union Planters Bank Memphis, TN 38101-1167	2,252
United Rentals Houston, TX 77210-4719	122
Upchurch Electrical Supply Fayetteville, AR 72702-8340	75

Shareholders of eLandia Solutions, Inc.

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Name and Address	# Shares of Stock
Vermeer Sales & Service	2,254
Memphis, TN 38101-1798	
Vermeer Southeast & Service	45
Orlando, FL 32855-5367	
Vision Splicing, L.L.C.	253
c/o Stephen Lee Wood	
Rogers, AR 72756	
Wanda Vaughn	121
Re/Max Real Estate Centre	
Jonesboro, AR 72401	
Warrior of Arkansas, Inc.	20
Rogers, AR 72756	
Washington County Tax Collector	430
Fayetteville, AR 72701	
Waste Management	19
c/o Jacquolyn Mills	
Houston TX 77002	
Water Products, Inc.	31
Owasso, OK 74055-0349	
Wayne Kallstrom	40
Skiatook, OK 74070	
Wayne Kallstrom	513
Bella Vista, AR 72714	
West-Ark Electric Co.	21
Springdale, AR 72764	
Williams Ford	62
Fayetteville, AR 72703	54
Wingfoot Commercial Tire	217
Springdale, AR 72762	
Wingfoot Commercial Tire Systems/ Accts rec	213
Fort Smith, AR 72902	
Wolfmac Construction	883
Allen Law Firm	
West Helena, AR 72390	

Shareholders of eLandia Solutions, Inc.

eLandia Technologies, Inc.
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Name and Address	# Shares of Stock
All Terrain Directional Boring, Inc.	698
c/o PRYOR, ROBERTSON & BARRY, PLLC	
Ft. Smith, AR 72902-0848	
American Electric Power	24
Canton, OH 44701-4422	
Antenna & Tower Services	21
Pelham, AL 35124	
Arcom Printing	79
Fayetteville, AR 72703	
Arkie Directional Boring	253
Elkins, AR 72727	
Aspen Publishers, Inc.	33
Allen Maxwell and Silver	
Englewood Cliffs, NJ 07632	
B21 Technologies	45
Richardson, TX 75080	
Lin Bao	388
Randolph, NJ 07869-4421	
Bandwith.Com	21
Cary, NC 27513	
Bear Mountain Photography	42
Fayetteville, AR 72701	
BellSouth	104
Atlanta, GA 30374-0144	
Bernstein & Drucker, P.C.	623
New York, NY 10123	
Boardman, Carr, Weed & Hutcheson, P.C.	124
Chelsea, AL 35043-8211	
Bore Master, Inc.	307
Maitland, FL 32794	
CNA Surety	132
Sioux Falls, SD 57104	
CT Corporation System	38
Wilmington, DE 19801	

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Name and Address	# Shares of Stock
Canawill Inc.	231
Philadelphia, PA 19107	
Capital Printing Systems Inc.	234
New York, NY 10017	
Cathy Shippee	65
North Kingstown, RI 02852-5836	
Christy Weikel	7
Fayetteville, AR 72701	
Clark Hinkle	172
Conyers, GA 30013	
Comdata Network, Inc.	1,706
Brentwood, TN 37027	
Community Bank of North Arkansas	367
Fayetteville, AR 72703	
Cooper Clinics, P.A.	54
Fort Smith, AR 72918-0517	
Crecent Electrical Supply	64
East Dubuque, IL 61025-4420	
Cude Consulting, Inc.	56
Fayetteville, AR 72703	
DCD Consultants LLC	5,597
Springdale, AR 72764	
Davis, Matthews & Quigley, PC	97
Atlanta, GA 30326	
Delta Dental	170
Sherwood, AR 72120	
Department of the Treasury	555
Little Rock, AR 72201	
Directional Air, Inc.	479
Fayetteville, AR 72702	
Dorato Group, Inc.	19
Houston, TX 77077	
Electro Rent Corporation	173
Palatine, IL 60055-0997	

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Name and Address	# Shares of Stock
Enterprise Fleet Services New Albany, OH 43050	18
Etrade Addison, TX 75001	121
FedEx Memphis, TN 38101-1140	46
Futurecom Telecommunications Springdale, AR 72764	20
Global Rentals Co, Inc. Birmingham, AL 35242	1,800
Herman, Howry & Breen L.L.P. Austin, TX 78705	175
IFWORLD, Inc. Fayetteville, AR 72703	29
J. Lynn Bradley El Dorado, AR 71730	398
Jackson Walker LLP Austin, TX 78701	111
Jackson Walker LLP Austin, TX 78701	86
L&L Communication Services Lathrop, MO 64465	27
Lara Michelle Pair Atlanta, GA 30312	767
Michael Salazar Fayetteville, AR 72703	18
Myron Chicago, IL 60680-2616	58
Nova System Health Little Rock, AR 72211	229
Office Depot Cincinnati, OH 45263-3211	57

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Name and Address	# Shares of Stock
Oklahoma Tax Commission	61
Oklahoma City, OK 73152-3248	
Pearson, Patton Shea, Foley	29
Las Vegas, NV 89145	
Professional Business Systems	193
Rogers, AR 72756	
RP Power LLC	26
North Little Rock, AR 72118	
Radisson Hotel	113
Fayetteville, AR 72701	
Rawlings, Neiland, Probasco,	114
Killinger, Ellwanger, Jacobs &	
Mohrhauser, L.L.P.	
Sioux City, IA 51101	
Rhon Products, Inc.	62
Frankfort, IN 46041	
SBC Long Distance	23
Dallas, TX 75266	
Sabre Communications Corporation	129
c/o Rebecca A. Nelson	
Rawlings, Neiland, Probasco,	
Killinger, Ellwanger, Jacobs & Mohrhause	
Sioux City, IA 51101	
Sabre Site Solutions	120
Sioux City, IA 51102	
Sanjay K Sharma	48
Bothell, WA 98012	
Scott Equipment/Case VA	312
Palatine, IL 60055-0460	
Steven White	405
Cumming, GA 30041	
Tessco	19
Hunt Valley, MD 21031-1494	
The Ribero Company	42
Las Vegas, NV 89120	

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Name and Address	# Shares of Stock
Tower Systems, Inc. Watertown, SD 57201	318
Tyrad Inc. Jacksonville, FL 32204	181
UNUM Life Insurance Atlanta, GA 30384	20
Union Planters Bank, N.A. Memphis, TN 38101-1167	245
Van Buren & Hauke New York, NY 10016	1,851
Subtotal	200,000
TOTAL OF ATTACHMENT A, B AND C	9,700,000