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1 And I suggest maybe we make a copy or two and  
2 you can keep one if you like.  
3 BY MR. VIERGUTZ:  
4 Q. Was Debco in existence prior to 1989 when --  
5 **A. No.**  
6 Q. -- Sands was formed?  
7 **A. Debco may have been.**  
8 Q. Do you know when Debco was formed?  
9 **A. No.**  
10 Q. Did you form it?  
11 **A. No.**  
12 Q. Do you know who did?  
13 **A. Yes.**  
14 Q. Who?  
15 **A. Debbie Chin.**  
16 Q. Did you buy it from her?  
17 **A. Yes.**  
18 Q. What did you pay for it?  
19 **A. Well, I don't know. I'd have to ask the CPA**  
20 **back then, because I bought her property and her**  
21 **corporation.**  
22 Q. When was that, approximately?  
23 **A. About 2000, I guess.**  
24 Q. Under what liquor license was Fantasies  
25 operating through August 9th of 2013?

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1 **A. 516, I believe.**  
2 Q. Say that again.  
3 **A. I think the number was 516. 561. Each liquor**  
4 **license has a number. Is that what you're asking me?**  
5 Q. Was it Debco's? Who was the registered owner?  
6 **A. Debco.**  
7 Q. Any specific person?  
8 **A. Carol Hartman. Well, it was me to start with,**  
9 **and then it was Carol.**  
10 Q. Why was it that you didn't use Debco's license  
11 after August 9th, 2013?  
12 **A. Because she pulled it.**  
13 Q. Who pulled it?  
14 **A. Carol.**  
15 Q. Carol did?  
16 **A. Uh-huh.**  
17 Q. Why did she do that?  
18 **A. Because I had sold her my business and the**  
19 **liquor license and everything, but because there was a**  
20 **piece of paper that wasn't filed, I was not able to get**  
21 **the liquor license back without going through a bunch**  
22 **of...**  
23 Q. When was that?  
24 **A. When it was pulled?**  
25 Q. When it wasn't filed.

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1 **A. When I sold the business to her in about -- it**  
2 **was technically in 2008, but she actually took over about**  
3 **in 2003 or '04. But in 2008, when I sold it to her, she**  
4 **was supposed to take care of all the paperwork, and I left**  
5 **town and she did not file the UCC or a couple other**  
6 **papers. By not filing the UCC, I was not able to get the**  
7 **liquor license back in my name in spite of bills due**  
8 **against it.**  
9 Q. Taking that out of the picture, Ms. -- well,  
10 let's call her Carol.  
11 Carol's performance as relates to her  
12 bookkeeping duties, were you satisfied with that?  
13 **A. Well, I thought I was when I first dealt with**  
14 **her and everything. She was very good at what she did.**  
15 Q. Did you later make a different determination?  
16 **A. Yes.**  
17 Q. What was that?  
18 **A. Well, after -- because I don't know book work,**  
19 **but after I started looking at it and having other people**  
20 **tell me she was just filing things wrong, naming them**  
21 **wrong, not putting them in the right area, and then later**  
22 **on when her boys started working with her in the club,**  
23 **things just went downhill.**  
24 Q. Did you find her to be dishonest in her  
25 bookkeeping?

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1 **A. No, I don't think so.**  
2 Q. Obviously you had an issue with her performance  
3 in the regard you've discussed.  
4 Did you have any other problem, other than her  
5 not filing papers?  
6 **A. It wasn't that she didn't file papers. She**  
7 **just -- I couldn't understand what she was doing. She**  
8 **knew what she was doing and I couldn't understand it. And**  
9 **then, you know, just -- I don't even know how to explain**  
10 **it. It just wasn't copacetic.**  
11 Q. From the time you and Mr. Rammell started  
12 working together, did you have much contact with him  
13 directly?  
14 **A. A bit, but Gene probably had more contact with**  
15 **him than I did.**  
16 Q. Could you give me an estimate of how many times  
17 you dealt with Mr. Rammell between October and when --  
18 **A. 30, 40, 50.**  
19 Q. Did you have any type of written agreement with  
20 Mr. Rammell when he started in October?  
21 **A. No.**  
22 Q. Now, if I can have you look at this book -- and  
23 they're tabbed like A -- before we go anywhere, there's a  
24 note on the top of A in handwriting, and would you read  
25 that handwritten note to me?

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1 **A. "Lease on file with ABC. Forged by Carol."**  
2 Q. And do you know whose handwriting that is?  
3 **A. Yes. My sister's.**  
4 Q. That's Carol's?  
5 **A. That handwriting?**  
6 Q. Yes.  
7 **A. I have no idea who that is.**  
8 Q. Do you agree with what that handwriting states?  
9 **A. Yes.**  
10 Q. And why is that forged?  
11 **A. Because I was not around when she wrote this up**  
12 **and she forged my name on it, and it's not even the right**  
13 **document. This thing says it was written up in November**  
14 **of 1998, and it's a landlord-tenant thing, and it names**  
15 **Club Elixer in here, and Club Elixer was not in existence**  
16 **until the middle of the 2000s. After 2008. Probably**  
17 **2009. So the document is just totally bogus.**  
18 Q. The second to the last page of that is a power  
19 of attorney.  
20 Is that your signature on that power of  
21 attorney?  
22 **A. Yes, it is.**  
23 Q. And it's dated January 6, '94; is that correct?  
24 **A. That's what it says, yes.**  
25 Q. And that provides the power of attorney to Carol

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1 Hartman; is that correct?  
2 **A. Uh-huh.**  
3 Q. And then the next page is a revocation of that  
4 power of attorney; is that correct?  
5 **A. That's right.**  
6 Q. It's dated the 27th of July 2012?  
7 **A. Uh-huh.**  
8 Q. And so between January 6, '94, and July 27,  
9 2012, Carol Hartman had a power of attorney?  
10 **A. Yes.**  
11 Q. Did you ever revoke it prior to July 27, 2012?  
12 **A. Not that I recall.**  
13 Q. Then if you'd turn to D, please, Exhibit D like  
14 dog.  
15 Now, that's a management agreement, right?  
16 **A. Yeah.**  
17 Q. And it's dated October 24, 2012, correct? First  
18 line, page 1.  
19 **A. Okay.**  
20 Q. Is that correct?  
21 **A. Yes.**  
22 Q. And that is signed by Carol Hartman on Bates 6  
23 on the bottom right?  
24 **A. Yeah.**  
25 Q. That's between Debco and Mr. Rammell, correct?

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1 **A. Yes, I guess. Carol and Logan.**  
2 Q. It says "between Debco, Inc." in line 2 of  
3 page 1, correct?  
4 **A. Okay.**  
5 Q. You don't dispute that, do you?  
6 **A. Line 2, page 1. No.**  
7 Q. Have you seen this before today?  
8 **A. Yeah.**  
9 Q. Did you see it back in 2012?  
10 **A. Yeah.**  
11 Q. Did you object to it?  
12 **A. No.**  
13 Q. Did you read it?  
14 **A. I did.**  
15 Q. Now, I can read, if you want me to, some  
16 discovery responses, but I'm going to estimate in eight or  
17 ten places Mr. Stibitz -- and they're signed by  
18 Mr. Greaves down there -- the responses say that there was  
19 an oral management agreement in existence between you and  
20 Mr. Rammell.  
21 **A. When?**  
22 Q. 2012. Would you disagree with that?  
23 **A. No.**  
24 Q. What --  
25 **A. This is a management agreement between Carol and**

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1 **him, not between him and I.**  
2 Q. I appreciate your interpretation, and I thank  
3 you for that.  
4 Nevertheless, my question --  
5 MR. VIERGUTZ: Could you read my question back,  
6 please?  
7 (The following question was read back:  
8 Q. Now, I can read, if you want me to, some  
9 discovery responses, but I'm going to estimate  
10 in eight or ten places Mr. Stibitz -- and  
11 they're signed by Mr. Greaves down there -- the  
12 responses say that there was an oral management  
13 agreement in existence between you and  
14 Mr. Rammell.)  
15 BY MR. VIERGUTZ:  
16 Q. What were the terms of the oral agreement  
17 between you and Mr. Rammell?  
18 **A. I'm not sure what you're asking, actually.**  
19 Q. Did you have an oral management agreement with  
20 Mr. Rammell?  
21 **A. Yeah. He was supposed to come in and manage.**  
22 Q. And what were the terms of his duties?  
23 **A. He was basically to do everything.**  
24 Q. Everything?  
25 **A. Uh-huh. Like he was running it, like he was a**  
**manager.**  
Q. He was taking in the money?  
**A. Yes.**

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1 Q. And how would he determine what he kept versus  
2 you, what you got?  
3 **A. He was supposed to pay all the bills, the**  
4 **mortgage, the insurances, all those things, and then after**  
5 **that he kept what he wanted.**  
6 Q. Through -- from October 2012 through August of  
7 2013; is that accurate?  
8 MR. STIBITZ: Just object to the form. I think  
9 she's testified that was a separate agreement between  
10 Carol and Logan and you're asking again about --  
11 MR. VIERGUTZ: No. I'm asking about the oral  
12 agreement.  
13 BY MR. VIERGUTZ:  
14 Q. And you're telling me -- you just told me some  
15 terms, correct?  
16 **A. Basically, yes.**  
17 Q. And the money he kept; is that correct?  
18 **A. The -- he was supposed to pay, as far as I**  
19 **remember, the mortgage, the insurance, the taxes, the**  
20 **utilities, everything that goes with the business, and**  
21 **then pay all the employees and everything, and then after**  
22 **that he kept it.**  
23 Q. What did you get?  
24 **A. Nothing.**  
25 Q. So he ran the --

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1 **A. I got to stay open.**  
2 Q. Thank you. He ran the club between October 2012  
3 to August 9th, 2013, and he paid the bills, kept the net  
4 after that?  
5 **A. Didn't pay all the bills, no.**  
6 Q. Okay. What didn't he pay?  
7 **A. He didn't pay -- he did not pay rent. The rent**  
8 **was paid as the mortgage, but there was nothing -- that's**  
9 **why I got nothing. There was nothing paid to me.**  
10 MR. VIERGUTZ: Would you read that answer back  
11 to me, please?  
12 (Previous answer was read back)  
13 BY MR. VIERGUTZ:  
14 Q. So the only thing you got is the mortgage  
15 payment?  
16 **A. Uh-huh.**  
17 Q. If you'd turn to page 2 of Exhibit D, the first  
18 paragraph talks about a term "One year beginning,"  
19 according to the numbered paragraph 3, "October 25th,  
20 2012."  
21 Is that the way you read it?  
22 **A. Uh-huh.**  
23 Q. Okay. Ma'am, I'm sorry. Like "uh-huh," she  
24 can't do that. It has to be "yes" or "no."  
25 **A. Yes.**

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1 Q. Thank you. Subparagraph 4.A., is that what you  
2 were describing to me as Mr. Rammell's duties?  
3 **A. Uh-huh, basically.**  
4 Q. Is that an accurate description contained within  
5 A?  
6 **A. I believe so.**  
7 Q. And then B, can you tell me what bank account --  
8 the operational account, what bank account that is?  
9 **A. It had to go into whatever Carol was -- had**  
10 **opened at the time, and I don't know if that was -- I**  
11 **think it was Wells Fargo. I'm not sure.**  
12 Q. Okay.  
13 **A. That's their contract between them.**  
14 Q. Page 3, numbered paragraph 6, is that -- I need  
15 you to take the time to read A and B --  
16 MR. STIBITZ: Can we take a short break just to  
17 let her read it? And the only reason I ask is I wouldn't  
18 mind getting a set.  
19 MR. VIERGUTZ: I asked you to bring your  
20 exhibits.  
21 We can take a break after we're done with this  
22 exhibit.  
23 BY MR. VIERGUTZ:  
24 Q. It reads 6.A. and B, and then just tell me when  
25 you're done.

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1 **A. Okay. I'm done.**  
2 Q. Is there anything inconsistent with what's in  
3 paragraph 6 relating to the obligations as expressed there  
4 versus your understanding of what Mr. Rammell was supposed  
5 to do?  
6 **A. Well, it looks to me like he was supposed to pay**  
7 **all the bills, and if he couldn't pay the bills, then**  
8 **Carol was supposed to pay for them.**  
9 Q. Is that inconsistent with your understanding of  
10 the agreement you had with Mr. Rammell?  
11 **A. I'm still getting confused with what you're**  
12 **asking me and what this is, because this is his -- this is**  
13 **his contract with her.**  
14 Q. And I thank you for that interpretation. My  
15 question stands.  
16 Is there anything inconsistent in paragraph 6  
17 with your understanding of what Mr. Rammell was obligated  
18 to do?  
19 **A. I don't know.**  
20 Q. Why don't you know?  
21 **A. Because I don't really understand what you're**  
22 **asking. I don't know what you're getting at.**  
23 Q. Let's take it line by line, ma'am. We can be  
24 here all day. That's fine.  
25 "The owner shall ultimately be responsible for

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1 payment of all expenses of operation" --  
2 **A. Where are you at?**  
3 Q. 6.A. I'll start again. Are you there?  
4 **A. I think I'm there.**  
5 Q. 6.A. "As required by Title 4, the owner shall  
6 ultimately be responsible" --  
7 **A. I'm on a different page or something than you**  
8 **are.**  
9 Q. Page 2. Excuse me. Bates 3, Number 6.  
10 **A. No. It's on this page.**  
11 Q. Okay. Let's look at number 6. And have you  
12 read A and B now?  
13 **A. Yeah.**  
14 Q. Let's look at what I'm reading. "As required by  
15 Title 4, the owner shall ultimately be responsible" --  
16 **A. That's not what this is saying here. That's why**  
17 **I'm confused.**  
18 Q. Excuse me. Paragraph 4. I'm giving you a bad  
19 number. My problem. Not yours. I apologize.  
20 If you'd read 4.A. and B, please. We've been  
21 there, I believe. And I think you said you agree that  
22 that is your understanding of his --  
23 **A. Okay.**  
24 Q. Is that correct?  
25 **A. Uh-huh.**

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1 Q. You don't have any argument with A or B; is that  
2 correct?  
3 **A. I -- again, it's their thing. I don't know if**  
4 **there's any argument with it or not.**  
5 Q. Well, was he responsible to pay the expenses of  
6 operation during the pendency of --  
7 **A. According to this, yes.**  
8 Q. Was he responsible, in your mind? I'm not  
9 asking about this document. I'm asking, in your mind,  
10 your agreement with Mr. Rammell is that what he was  
11 supposed to do?  
12 **A. Yes.**  
13 Q. Okay. And was he to pay employees' wages and  
14 salaries and the taxes and contributions --  
15 **A. Yes.**  
16 Q. -- associated with that?  
17 Was he to pay the real and personal property  
18 taxes?  
19 **A. Yes.**  
20 Q. Was he to pay the insurance?  
21 **A. Yes.**  
22 Q. Was he to pay the inventory purchases?  
23 **A. Yes.**  
24 Q. Was he to pay the cost to repair or replacement  
25 of equipment, furnishings and fixtures?

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1 **A. Yes.**  
2 Q. Was he responsible to the extent necessary to  
3 pay so there weren't liens or claims on the license?  
4 **A. Yes.**  
5 Q. And then we go to B.  
6 Was it his responsibility, in your mind, to  
7 deposit daily funds received from the operation of  
8 business from the previous day into a bank account?  
9 **A. Yes.**  
10 Q. And there was an operational account; is that  
11 correct?  
12 **A. As far as I know.**  
13 Q. And you've said you believe it's Wells Fargo?  
14 **A. As far as I know.**  
15 Q. But that's Carol's?  
16 **A. Right.**  
17 Q. And her and Mr. Rammell were signatories on that  
18 account?  
19 **A. I don't know that. It says that, but I don't**  
20 **know if that's true.**  
21 Q. During the time we're talking here, which is  
22 October '12, October 2012, what accounts were in the name  
23 of either Fantasies or the liquor license, Debco?  
24 **A. Alaska USA.**  
25 Q. Any others?

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1 **A. No. Not mine. Nothing I signed on.**  
2 Q. Let's go to the next page, and there's number 6.  
3 And again, I'd like you to read 6.A. and B. Just tell me  
4 when you're done.  
5 **A. Okay.**  
6 Q. Again, based on your understanding of what you  
7 believe Mr. Rammell was to do, does paragraph 6 express  
8 accurately the obligations?  
9 **A. I think so.**  
10 Q. And then paragraph 9, that basically says he's  
11 responsible for the full and complete control of the  
12 day-to-day operations; is that correct?  
13 **A. Yes.**  
14 Q. Is that accurate, based on what your  
15 understanding was?  
16 **A. Yes.**  
17 Q. Now, the last page of Exhibit D, like dog, is  
18 there anything on there -- that's your handwriting?  
19 **A. Yeah.**  
20 Q. What is?  
21 **A. My signature.**  
22 Q. Okay. Did you author this?  
23 **A. I or Gene wrote it.**  
24 Q. Okay. And do you know who Chris is?  
25 **A. No.**

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1 Q. Are you familiar with --  
2 **A. It's probably somebody from the liquor board. I**  
3 **don't know.**  
4 Q. Did you provide this document to the liquor  
5 board?  
6 **A. Probably. It's got a fax number, but I don't**  
7 **know. I'm presuming that --**  
8 Q. Either you or Mr. Greaves?  
9 **A. That's where it went.**  
10 Q. It's dated October 22, 2012?  
11 **A. That's when it was faxed.**  
12 Q. It's dated that too, correct?  
13 **A. Yeah.**  
14 Q. "To Whom it May Concern, I am working with Logan  
15 Rammell to come to an agreement to reinstate the liquor  
16 license under a management agreement at the Fantasies on  
17 Fifth location at 1911 East Fifth Avenue."  
18 MR. VIERGUTZ: When we get done with this page  
19 we'll take a break, if that's okay.  
20 BY MR. VIERGUTZ:  
21 Q. What are you referring to there, management  
22 agreement? Are you referring to a written agreement or an  
23 oral agreement?  
24 **A. I presume that's the management agreement we**  
25 **just were discussing.**

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1 Q. Okay. Because this is the 22nd, and if you look  
2 at Exhibit D, that's dated the 24th, two days after that.  
3 Would that be correct?  
4 **A. Yeah, it is.**  
5 Q. And the next sentence says, "He will be signing  
6 a lease for the bar in the event that the management  
7 agreement is signed and sealed."  
8 And management agreement Exhibit D is signed,  
9 correct?  
10 **A. Uh-huh.**  
11 Q. Did you enter into a lease?  
12 **A. I don't know.**  
13 Q. Who would know?  
14 **A. Probably Gene.**  
15 Q. As you sit here today, do you have any  
16 recollection of a lease being entered into with  
17 Mr. Rammell between October of 2012 and the end of July  
18 2013?  
19 **A. I would have to look at my papers again.**  
20 Q. What papers would you have to look at?  
21 **A. Papers that are out in the car.**  
22 Q. Did you provide those papers to your attorney at  
23 any point?  
24 **A. To this attorney?**  
25 Q. To any attorney.

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1 **A. I don't know. We were working with Coffey and**  
2 **Ernouf, but I don't remember what papers we gave them.**  
3 Q. Did you provide them to Mr. Stibitz?  
4 **A. I don't know.**  
5 Q. How would you find out?  
6 **A. Ask him.**  
7 Q. Okay.  
8 MR. VIERGUTZ: Let's take a break. He asked for  
9 a break. That's fine.  
10 (Recess taken)  
11 BY MR. VIERGUTZ:  
12 Q. Earlier you said you sold the business to Carol,  
13 is that correct, the building and everything; is that  
14 right?  
15 **A. Uh-huh. Yes.**  
16 Q. Then you took it back; is that correct?  
17 **A. Yes.**  
18 Q. Did you take back both the business and the  
19 building or just the building or just the business?  
20 **A. I took back the building and hopefully the**  
21 **business.**  
22 Q. The liquor license?  
23 **A. No. I never got the liquor license back because**  
24 **of ABC issues.**  
25 Q. What were those issues?

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1 **A. The UCC was not filed.**  
2 Q. And as a result of that did anything occur with  
3 that license?  
4 **A. Yeah.**  
5 Q. What occurred?  
6 **A. She took it out of the business and we were not**  
7 **able to run the business at that point. She pulled it.**  
8 Q. What is the business other than the liquor  
9 license?  
10 **A. Strip club.**  
11 Q. Okay. So you can operate a strip club without a  
12 liquor license?  
13 **A. Yes, you can.**  
14 Q. And could you have done that in August of 2013?  
15 **A. Yes.**  
16 Q. Or September?  
17 **A. Any time.**  
18 Q. Any time.  
19 **A. There are permits and everything that go with**  
20 **that also.**  
21 Q. Right. But you don't necessarily have to have a  
22 liquor license to run a strip club, correct?  
23 **A. Right.**  
24 Q. You can still do business?  
25 **A. Uh-huh.**

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1 Q. And ultimately did -- was there a lien on that  
2 liquor license?  
3 **A. Several.**  
4 Q. And do you recall by who?  
5 **A. Myself, my sister, her son, and I don't know if**  
6 **there were any vendor -- I don't know if there was any**  
7 **vendors that had liens. I don't think so.**  
8 Q. Was there a judgment ever against that license?  
9 **A. No.**  
10 Q. What was the suit in New York? What did that  
11 involve?  
12 **A. I don't have any clue. Something with my sister**  
13 **and withdrawing from the union.**  
14 Q. Do you know anything about it at all?  
15 **A. No.**  
16 Q. Do you know if it was just liens by you and your  
17 sister on the liquor license, you wouldn't have had to get  
18 a different one in August; isn't that correct?  
19 **A. Say that again.**  
20 Q. If it was just you and your sister who had liens  
21 against the Debco liquor license, you could have released  
22 those liens and still used that license, correct?  
23 **A. I could have released them, but she wouldn't**  
24 **release hers.**  
25 Q. She would not?

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1 **A. No.**  
2 Q. Did you ask her?  
3 **A. Yeah.**  
4 Q. She said no?  
5 **A. Uh-huh.**  
6 Q. Okay. What's your understanding of why Coffey  
7 would not continue as lawyer?  
8 **A. Conflict of interest is all he said, and he was**  
9 **not actually our lawyer. It was Ernouf.**  
10 Q. Ernouf was. Okay. In Coffey's office?  
11 **A. Right.**  
12 Q. Did his withdrawal as attorney cause any  
13 problems to you?  
14 **A. Yes.**  
15 Q. Why?  
16 **A. Because I had to find another attorney and start**  
17 **inventing the wheel all over again. This is very**  
18 **convoluted from the very beginning to the end and try to**  
19 **explain it to somebody is very hard.**  
20 Q. What's convoluted about it, in your mind?  
21 **A. Everything. From when I sold it to my sister**  
22 **all the way up until Logan taking over. It's just -- it's**  
23 **a mess.**  
24 Q. Was Ernouf involved in working with both you and  
25 Logan?

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1 **A. Yes.**  
2 Q. To try to make this deal work?  
3 **A. Yes.**  
4 Q. And if you look at Exhibit G, is that an e-mail  
5 you sent to Ernouf relating to your learning of that  
6 firm's withdrawal?  
7 **A. Yes.**  
8 Q. And does that accurately depict your thoughts on  
9 the matter?  
10 **A. I would presume so.**  
11 Q. You wrote it, though, correct?  
12 **A. Yes.**  
13 Q. I'm skipping around in time, but let's go to  
14 Exhibit K, please, if you would. K is an indemnification  
15 agreement. That has Mr. Greaves' signature and yours,  
16 correct?  
17 **A. Under power of attorney.**  
18 Q. But do you dispute that he had the authority to  
19 sign for you?  
20 **A. No.**  
21 Q. Why did you authorize him to sign this  
22 agreement?  
23 **A. I authorized him to sign anything he wanted to.**  
24 Q. Did you review this agreement before it was  
25 signed?

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1 **A. Probably not.**  
2 Q. You don't have any recollection?  
3 **A. No.**  
4 Q. Have you --  
5 **A. I just don't remember.**  
6 Q. Do you know why it was signed?  
7 **A. Yes. Because Logan was very afraid of my sister**  
8 **filing some kind of a lawsuit which he might be involved**  
9 **in.**  
10 Q. So it's your understanding that the reason this  
11 agreement was entered into is because of Carol?  
12 **A. Yes.**  
13 Q. Where do you come to that understanding?  
14 **A. Through many, many conversations.**  
15 Q. With who?  
16 **A. With Logan.**  
17 Q. Did Mr. Rammell tell you that?  
18 **A. Yes.**  
19 Q. Did he tell you that was the only reason he --  
20 **A. No.**  
21 Q. -- presented this agreement?  
22 **A. No.**  
23 Q. Who drafted it?  
24 **A. I presume Gene did.**  
25 Q. Mr. Greaves?

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1 **A. Yes.**  
2 Q. You don't know that for sure?  
3 **A. No.**  
4 Q. I just need to understand what you know, so I  
5 need to know that that's accurate.  
6 Now, the first paragraph under recitals, "Club  
7 Vega has agreed to purchase a liquor license for use on  
8 the premises," is that accurate?  
9 **A. Yes.**  
10 Q. The second paragraph, "By separate agreement,  
11 Club Vega will operate the premises and utilize the liquor  
12 license; is that accurate?  
13 **A. As far as I know, yes.**  
14 Q. The next paragraph, "By separate agreement, Club  
15 Vega has agreed to sell the liquor license to Fantasies on  
16 Fifth," is that accurate?  
17 **A. Uh-huh.**  
18 Q. What is this separate agreement that's being  
19 referred to?  
20 **A. I don't know.**  
21 Q. You don't know?  
22 **A. I don't have a clue.**  
23 Q. And then the next one, it says, "Logan Rammell  
24 and Club Vega will seek indemnity for the past and current  
25 operation of the premises of the liquor license prior to

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1 sale of the liquor license to Fantasies."  
2 Is there anything about that paragraph you don't  
3 understand?  
4 **A. I don't think so.**  
5 Q. And do you understand the final paragraph that  
6 says "Indemnification"?  
7 **A. Yeah.**  
8 Q. You do understand it?  
9 **A. As far as I know.**  
10 Q. And then if we could go to Exhibit L, please.  
11 And that's a three-page document.  
12 The third page is just a signature of  
13 Mr. Greaves; is that correct?  
14 **A. Uh-huh. Yes.**  
15 Q. And did you look at this agreement before it was  
16 signed?  
17 **A. I did not.**  
18 Q. Would it be accurate to say you left most of the  
19 management up to Mr. Greaves?  
20 **A. Yes.**  
21 Q. And he did most of the dealings that had to be  
22 dealt with with Mr. Rammell; it was he personally instead  
23 of you?  
24 **A. Yes.**  
25 Q. Other than the meeting with Travis that set up

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1 Mr. Rammell meeting you, what did Travis have to do with  
2 the operation of Fantasies?  
3 **A. Back then?**  
4 Q. Yeah.  
5 **A. Basically nothing. Construction work.**  
6 Q. So from October 2012 until he became the  
7 100 percent owner of Fantasies, he had no real  
8 involvement; would that be accurate?  
9 **A. I guess it would be.**  
10 Q. And why did he come to be 100 percent owner of  
11 Fantasies?  
12 **A. Because Logan was supposed to find financing for**  
13 **the liquor license. He had backers. He never came**  
14 **through. I have insurance policies with my son as**  
15 **beneficiary. I had to borrow money from my insurance**  
16 **policies to buy the new liquor license. So therefore,**  
17 **Travis is the owner of them. And I was getting sick and**  
18 **tired of it.**  
19 Q. And is he still the owner?  
20 **A. Yes.**  
21 Q. And does he operate the club now?  
22 **A. No. He has a manager.**  
23 Q. Who is that?  
24 **A. Yana.**  
25 Q. Is it a she?

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1 **A. She.**  
2 Q. Does she have a written management agreement?  
3 **A. I think she does.**  
4 Q. Do you know who authored that?  
5 **A. I don't know if that was done by an attorney. I**  
6 **don't know.**  
7 Q. When is the last time you saw that management  
8 agreement?  
9 **A. I couldn't tell you that.**  
10 Q. Would it be this calendar year?  
11 **A. I don't know.**  
12 Q. Did you read it before she signed it, that you  
13 recall?  
14 **A. No.**  
15 Q. So would it be true that you left that up to  
16 Mr. Greaves?  
17 **A. Greaves or Travis.**  
18 Q. What are Travis' responsibilities now?  
19 **A. To stay out of the way, let her do her job.**  
20 Q. And when was she hired?  
21 **A. I don't know.**  
22 Q. Until she was hired, what were Travis'  
23 responsibilities?  
24 **A. Construction.**  
25 Q. So is it accurate to say Travis has never been

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1 involved in the management or the conducting of business  
2 of Fantasies?  
3 **A. Yeah. He's been involved in a certain amount of**  
4 **it. Not since he got -- since he got the liquor license**  
5 **in his name.**  
6 Q. What does he do?  
7 **A. I don't know. I'm not here.**  
8 Q. So you don't have any testimony to offer on what  
9 the duties of Mr. Gravelle have been since August of 2013?  
10 **A. No.**  
11 Q. Who would best know that?  
12 **A. Travis or Eugene.**  
13 Q. How long have you known Mr. Gravelle?  
14 **A. All his life. He's my son.**  
15 Q. I'm sorry. Mr. Greaves.  
16 **A. Ten years.**  
17 Q. Do you know what his history is in business?  
18 **A. Yes.**  
19 Q. What is that?  
20 **A. He was a New York, Suffolk County, detective.**  
21 Q. Did he operate a business?  
22 **A. Yes.**  
23 Q. Private business?  
24 **A. Yes.**  
25 Q. What was that?

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1 **A. I believe it was in sanitation and security.**  
2 Q. Is that in New York?  
3 **A. Yes.**  
4 Q. Other than Fantasies, do you know whether he's  
5 been involved in any business in Alaska?  
6 **A. I don't think so.**  
7 Q. Have you ever been sued before?  
8 **A. I don't know.**  
9 Q. Is it that you don't recall?  
10 **A. I don't recall, no. I don't know. I've been in**  
11 **lawsuits, but I think I was the suer. I'm not sure.**  
12 Q. Name off to me, if you would, any lawsuits that  
13 you or any business in which you had an interest has been  
14 involved in.  
15 **A. I don't know.**  
16 Q. Your sister is suing you now?  
17 **A. No.**  
18 Q. No?  
19 **A. I don't think so.**  
20 Q. Do you have any other lawsuits existing right  
21 now in any state other than this one?  
22 **A. No.**  
23 Q. Now, relating to Exhibit L, is it your  
24 contention that Mr. Rammell breached this agreement?  
25 **A. Yes.**

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1 Q. How did he do that?  
2 **A. He did not come up with the money.**  
3 Q. Well, this says the buyer pays 150, correct?  
4 **A. And he was supposed to be buying it.**  
5 Q. Well, it lists the buyer as Fantasies, does it  
6 not?  
7 **A. It had to go from Wicked Wrister to Club Vega,**  
8 **and I paid that.**  
9 Q. So is it your understanding of this agreement  
10 that Mr. Rammell has the obligation to pay Wicked Wrister?  
11 I can't say that.  
12 **A. It's a tongue twister.**  
13 Q. Wrister, W-r-i-s-t-e-r.  
14 **A. Yes. You asked me if he was obligated to pay**  
15 **Wicked Wrister. Yes.**  
16 Q. Under this agreement, under this Exhibit L?  
17 **A. Probably not under this one. I don't know.**  
18 **It's convoluted again.**  
19 Q. What's convoluted?  
20 **A. This.**  
21 Q. "This" being Exhibit L?  
22 **A. Yes.**  
23 Q. Do you know who wrote it?  
24 **A. No.**  
25 Q. But this is a document again Mr. Greaves would

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1 have had primary responsibility for?  
2 **A. Yes.**  
3 Q. And you rely on him?  
4 **A. Yes.**  
5 Q. And you trust him?  
6 **A. Yes.**  
7 Q. Have you found his performance deficient in any  
8 fashion?  
9 **A. I find everybody's performance deficient in some**  
10 **fashion, yes.**  
11 Q. Why don't you tell me about Mr. Greaves'  
12 deficiencies.  
13 **A. He's too trusting in some cases.**  
14 Q. Anything else?  
15 **A. No.**  
16 Q. Was he too trusting in this case?  
17 **A. Probably, because I don't know how or who wrote**  
18 **this up, but it's -- it just doesn't show -- the way this**  
19 **should have been written is probably seller to buyer to**  
20 **seller to buyer. There's just a couple issues left out in**  
21 **there. And not being attorneys, we don't know all the**  
22 **little ins and outs of all these little words.**  
23 Q. Okay. Then if you'd go to Exhibit M, like Mary,  
24 please, and page 1 is a letter from the ABC Board to Carol  
25 Hartman, and it says that the landlord, you -- is that the



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1 way you look at yourself?  
2 **A. Uh-huh.**  
3 Q. Has terminated the lease; is that correct?  
4 **A. Uh-huh.**  
5 Q. Why did that occur?  
6 **A. I think it was about eleven months of lack of**  
7 **payment.**  
8 Q. Payment for what?  
9 **A. To me for the business.**  
10 Q. And did that involve rent?  
11 **A. Yes.**  
12 Q. And what else would it have involved?  
13 **A. It would have involved all the payments that**  
14 **were supposed to have been made to the utilities, to the**  
15 **bank, to everything being in arrears. And then when I**  
16 **came up I found drug use on the premises. I won't**  
17 **tolerate that.**  
18 Q. Do you know who was using drugs?  
19 **A. Yes.**  
20 Q. Who?  
21 **A. Her sons.**  
22 Q. And the second page, is that the notice you gave  
23 the ABC Board?  
24 **A. Uh-huh.**  
25 Q. And Mr. Greaves signed for you?

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1 **A. Yes.**  
2 Q. Did he construct the letter?  
3 **A. I presume.**  
4 Q. That would be normal in the way you and he  
5 operated?  
6 **A. Yeah.**  
7 Q. And then if you'd look at Exhibit N, like Noah,  
8 page 2 has a signature of yourself by Mr. Greaves.  
9 Did you authorize him to sign this?  
10 **A. I authorized him to sign anything he needed to**  
11 **sign, yes.**  
12 Q. And did you read Exhibit N --  
13 **A. No, I don't think I did at the time.**  
14 Q. Again, you would have left that to Mr. Greaves?  
15 **A. Yes.**  
16 Q. I don't see a signature of Mr. Rammell here --  
17 **A. He was in Bethel at the time. This had to be**  
18 **done for the liquor license transfer.**  
19 Q. Is it your contention he entered into this  
20 agreement?  
21 **A. I don't know.**  
22 Q. Do you know whether he ever signed it?  
23 **A. No, he didn't.**  
24 Q. Never?  
25 **A. As far as I know he didn't.**

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1 Q. Do you contend he's bound by it?  
2 **A. I don't know the laws.**  
3 Q. What's your understanding without law, just you?  
4 **A. I don't know. I presume he would be held to it.**  
5 **I don't know. Without signing, I don't know.**  
6 Q. Without what?  
7 **A. Without his signing, I don't know. I don't know**  
8 **what a verbal agreement is binding.**  
9 Q. Then if you'd go to Exhibit P, please, these are  
10 some texts between Mr. Gravelle and -- excuse me --  
11 Mr. Greaves and Mr. Rammell.  
12 Have you seen these before?  
13 **A. Just recently.**  
14 Q. When you say "recently," what does that mean?  
15 **A. Just when my attorney showed them to me a couple**  
16 **days ago.**  
17 Q. Okay. There's an entry on August 19, about the  
18 middle of the page sent by Mr. Greaves to Mr. Rammell, and  
19 it says, "Please tell Andrea."  
20 Who is that?  
21 **A. I don't know.**  
22 Q. "Please tell Andrea that effective immediately I  
23 will be handling all cash deposits," etcetera. "I will  
24 make bank each night also."  
25 Did you instruct Mr. Greaves to take that action

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1 on that date?  
2 **A. No.**  
3 Q. He did that on his own accord?  
4 **A. I presume.**  
5 Q. You talked earlier briefly about Mr. Rammell  
6 being in Bethel and he got a little wild, and would you  
7 describe to me again what was going on that caused that?  
8 **A. I believe it was probably to do with this**  
9 **conversation right here.**  
10 Q. Okay. And do you recall that that's the  
11 recorded conversation with Mr. Rammell that you have?  
12 **A. Yes.**  
13 Q. Where he was in Bethel and he's basically  
14 responding to you as a result of Mr. Greaves' text?  
15 **A. Yes.**  
16 Q. Now, if you could look at Exhibit Q, please, the  
17 next one.  
18 Did you physically put this on the door, this  
19 sign or sign that said that at Fantasies?  
20 **A. No.**  
21 Q. Did Mr. Greaves?  
22 **A. I don't know. You'll have to ask him.**  
23 Q. Okay. You don't know then?  
24 **A. No.**  
25 Q. Are you aware of any allegations that

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1 Mr. Rammell took property that you assert did not belong  
2 to him at any point in time --  
3 **A. Yes.**  
4 Q. -- between October 2012 and August 20th, 2013?  
5 **A. Yes.**  
6 Q. And what did he take?  
7 **A. Kitchen equipment, stereo equipment,**  
8 **miscellaneous dishes, silverware. I'm not sure.**  
9 Q. Did you ask for it back?  
10 **A. I don't know. I wasn't there at the time. I**  
11 **wasn't even aware it was gone for a while.**  
12 Q. When did you discover it was gone?  
13 **A. I don't know.**  
14 Q. Do you have an inventory of specifics?  
15 **A. I actually do.**  
16 Q. I haven't seen that.  
17 Did you give it to your counsel?  
18 **A. I -- I didn't.**  
19 Q. And when did he take this kitchen equipment and  
20 stereo equipment?  
21 **A. I don't know.**  
22 Q. Can you tell me what year it was?  
23 **A. I presume it was 2013.**  
24 Q. How did you come to realize it was gone?  
25 **A. I believe my son told me.**

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1 Q. Did you do any investigation yourself?  
2 **A. No.**  
3 Q. Are you aware of whether your son or Mr. Greaves  
4 did any?  
5 **A. No, I'm not aware of it.**  
6 Q. Now, earlier I referred to a trial brief, and  
7 you said you haven't read it, I believe.  
8 You read ours, but not your own?  
9 **A. Correct.**  
10 Q. Is it accurate that Fantasies had no liquor  
11 license between December 31, 2013, and March of 2014?  
12 **A. It probably is.**  
13 Q. And why didn't they have a liquor license?  
14 **A. That was probably -- those dates are probably**  
15 **when the liquor license from Wicked Wrister went into**  
16 **Logan's name and he refused to sign it over to us.**  
17 Q. Do you recall a note -- and we'll look at it --  
18 but just asking you right now if you recall a short note  
19 that Mr. Rammell sent to the ABC Board December 31st?  
20 **A. Yes.**  
21 Q. And do you recall, ballpark, what that says?  
22 **A. Probably just says to remove the liquor license.**  
23 Q. Okay. And that prompted you to have no liquor  
24 license, correct?  
25 **A. Right.**

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1 Q. Now, between -- we looked at those texts  
2 earlier -- let's say August 19 or 20 and December 31 you  
3 sold liquor, correct?  
4 **A. I presume we did.**  
5 Q. At Fantasies, correct?  
6 **A. Yes.**  
7 Q. And what license did you sell that liquor under?  
8 **A. I presume the new liquor license, 1078.**  
9 Q. Would I have to go to Mr. Greaves to get a  
10 definitive answer on that?  
11 **A. I don't know.**  
12 Q. Who could tell me what liquor license you sold  
13 it under, other than you or Mr. Greaves?  
14 **A. I don't know. Liquor board.**  
15 Q. It says here -- I can read it to you. It says,  
16 "Under the management agreement" -- this is your  
17 counsel -- "Club Vega and Rammell agreed to pay all  
18 payroll, utilities, inventory costs and other costs from  
19 the gross revenue generated by the bar."  
20 That's the oral management agreement you spoke  
21 of; is that correct?  
22 **A. I presume.**  
23 Q. Is that accurate?  
24 **A. I presume.**  
25 Q. Then under that oral management agreement what

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1 were Mr. Rammell's obligations?  
2 **A. To manage the bar as a manager would. Basically**  
3 **everything.**  
4 Q. Take in the money?  
5 **A. Uh-huh.**  
6 Q. Deposit the money?  
7 **A. Uh-huh.**  
8 Q. Pay the bills?  
9 **A. Uh-huh. Yes, yes, yes.**  
10 Q. Then it says here, "On August 20, Fantasies  
11 received notice from Club Vega and Rammell stating that  
12 they would pay payroll incurred from August 10 through  
13 August 20, 2013."  
14 Do you know if that occurred?  
15 **A. I think it did.**  
16 Q. Rammell paid that?  
17 **A. No. I don't think he did pay that.**  
18 Q. He did not. Fantasies received --  
19 **A. A notice from Club Vega stating they would pay**  
20 **payroll incurred. I don't know.**  
21 Q. So he's saying Club Vega said they would pay the  
22 payroll, and you don't know whether that occurred?  
23 **A. No.**  
24 Q. Is that something within Mr. Greaves' knowledge?  
25 **A. Yes.**

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1 Q. Then it says here -- and I'm on page 4 -- that  
2 they didn't do it.  
3 **A. Okay.**  
4 Q. It says here, "Despite its agreement, Club Vega  
5 and Rammell refused to do that." And then it says,  
6 "Club Vega and Rammell converted the revenue received from  
7 the premises between the 10th and the 20th and placed it  
8 in his safe at his house."  
9 Do you have personal knowledge of that?  
10 **A. No.**  
11 Q. And it says, "Fantasies is entitled to damages  
12 for breach of the management agreement and conversion  
13 equal to the value of the funds and property converted by  
14 Mr. Rammell and Club Vega." Okay?  
15 **A. Okay.**  
16 Q. How much is that?  
17 **A. I don't know.**  
18 Q. Who knows?  
19 **A. I would say my attorney and Gene.**  
20 Q. But you don't?  
21 **A. I don't know.**  
22 Q. Is there a piece of paper you've ever seen that  
23 has that figure on it?  
24 **A. No.**  
25 Q. Then it says -- well, let me step back a second.

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1 Is it your contention that -- when I asked you  
2 earlier about Mr. Rammell taking something that wasn't  
3 his, is it your contention that he also removed inventory  
4 that wasn't his?  
5 **A. I don't know that.**  
6 Q. You don't know that?  
7 **A. I don't know that, no.**  
8 Q. You certainly, because you don't know that,  
9 haven't seen any document with the value of that  
10 inventory; is that correct?  
11 **A. Right.**  
12 Q. Did you do -- or did you instruct Mr. Greaves or  
13 anyone to take an inventory of the liquor, Coke products,  
14 that type of thing on or about August 20 when Mr. -- 19 or  
15 20 --  
16 **A. I didn't instruct anybody.**  
17 Q. So you've never seen a document at all that has  
18 an inventory on it?  
19 **A. No.**  
20 Q. Now, Mr. Stibitz and I had to exchange witness  
21 lists, and yours basically has four names on it without  
22 Mr. Stibitz. He's the fifth one. But the first four are  
23 Mr. Greaves, yourself, Mr. Trotter, and Mr. Gravelle. And  
24 it says -- if you don't have knowledge, that's fine. I'm  
25 just asking what you know personally.

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1 It says, with regard to Mr. Gravelle,  
2 "Mr. Gravelle will testify regarding defendants" --  
3 that's Mr. Rammell and Club Vega -- "misappropriation of  
4 Fantasies' property."  
5 Do you know specifically what he's talking about  
6 there?  
7 **A. No.**  
8 Q. You don't know what property or what he  
9 misappropriated?  
10 **A. No. Just what I've heard.**  
11 Q. Sure.  
12 **A. I wasn't there.**  
13 Q. What you've heard is what you've testified to  
14 today, is that the kitchen equipment and the sound, the  
15 music equipment?  
16 **A. Uh-huh.**  
17 Q. Those two. Anything else?  
18 **A. I don't know.**  
19 Q. That's fair. I should ask Mr. Gravelle?  
20 **A. Uh-huh.**  
21 Q. And then it says you're going to testify about  
22 "Mr. Rammell's election or Club Vega" -- I use "Rammell."  
23 It's either one. Okay?  
24 **A. Okay.**  
25 Q. "Not to purchase the club."

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1 And what are you going to testify to relating to  
2 Mr. Rammell not purchasing the club?  
3 **A. Well, he came over, was hot to trot to get the  
4 club, said he had financial people to back him, we need to  
5 get a new liquor license, got in the process of all that,  
6 and I had told him that I did not have any more money  
7 available to put in the club. We went poor with all this.  
8 Comes time to buy the liquor license, he has no money at  
9 all. He had no money to buy inventory.**  
10 Q. When you say the liquor license, are you talking  
11 about the Debco or the substitute?  
12 **A. The substitute. We were hoping to get Debco,  
13 but it was so mixed up.**  
14 Q. Tell me if this is inaccurate. Okay?  
15 In October of 2012 both you and Mr. Rammell  
16 believed that his ultimately taking over Fantasies would  
17 be using the Debco liquor license?  
18 **A. Right.**  
19 Q. Okay. Then it says you're going to testify  
20 about damages arising from Mr. Rammell's and Club Vega's  
21 breach of contract, misappropriation.  
22 What are you going to testify to regarding  
23 damages?  
24 **A. Well, three months being out of business is very  
25 much damaging to everybody concerned. I had to personally**

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1 **pay all the ongoing bills, the taxes, the mortgage,**  
2 **everything, utilities that weren't being used. They're**  
3 **ongoing, but no income.**  
4 Q. And there you're talking about the time period  
5 December 31, 2013, through March of 2014?  
6 **A. Yes.**  
7 Q. Any other damages that you're aware of?  
8 **A. No.**  
9 Q. Have you seen any document that states these  
10 damages?  
11 **A. Notes.**  
12 Q. Notes?  
13 **A. That we've all talked about.**  
14 Q. Whose notes?  
15 **A. Probably Gene's.**  
16 Q. Okay. Have you seen those notes?  
17 **A. I haven't seen them. I've watched him writing,**  
18 **but I haven't seen them.**  
19 Q. When did you watch him write?  
20 **A. A couple, three days ago.**  
21 Q. Anything before that that you recall?  
22 **A. No.**  
23 Q. Then it talks about Mr. Greaves and it goes on  
24 to talk about Mr. Trotter. Before we go to him, I guess,  
25 what is your recollection of Mr. Trotter's involvement in

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1 this October 2012 to August 2013 time frame?  
2 **A. His involvement was basically a friend. He is a**  
3 **friend of Gene and I and he just came down to help.**  
4 Q. Help what?  
5 **A. Bookkeeping, basically.**  
6 Q. So did he replace Carol?  
7 **A. No, not per se. He set up some inventory**  
8 **control spreadsheets and things like that for us.**  
9 Q. And what's your understanding of what those  
10 spreadsheets' purpose was?  
11 **A. To organize the club a little bit.**  
12 Q. Did you review those and use them in any way in  
13 your work?  
14 **A. I've never seen them.**  
15 Q. Were you relying on Mr. Greaves or Mr. Trotter?  
16 **A. On what?**  
17 Q. On issues relating between October 2012 and  
18 August 2013?  
19 **A. Both.**  
20 Q. And what did you rely on Mr. Trotter for, other  
21 than the bookkeeping?  
22 **A. That's about it, as far as I know.**  
23 Q. Did you authorize Mr. Trotter to communicate  
24 with Mr. Rammell?  
25 **A. I didn't authorize him, but if he needed to, I'm**

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1 **sure he would.**  
2 Q. Was he a paid employee?  
3 **A. No.**  
4 Q. Did he live in the club?  
5 **A. I don't know. I wasn't here.**  
6 Q. Do you know whether he ever lived in the club?  
7 **A. No.**  
8 Q. Do you recall whether Mr. Trotter was involved  
9 in any negotiations relating to Mr. Rammell's --  
10 **A. I wouldn't know that.**  
11 Q. You're not aware of any?  
12 **A. No.**  
13 Q. You got the license, I think you said, '89 or  
14 something like that; is that right?  
15 **A. Yeah.**  
16 Q. For the Sands, and that was the Debco license?  
17 **A. The Sands was all nonalcoholic.**  
18 Q. Okay.  
19 **A. For 12, 15 years.**  
20 Q. When did you get the Debco license?  
21 **A. I would say around 2000.**  
22 Q. Okay. Is that the first liquor license you've  
23 ever had?  
24 **A. No.**  
25 Q. What did you have previous to that?

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1 **A. I had a liquor license in Palmer, Alaska in a**  
2 **motel.**  
3 Q. Which one is that?  
4 **A. It was called the Mariner.**  
5 Q. Oh, yeah.  
6 Any others?  
7 **A. I don't think so.**  
8 Q. Did you have any dealings with the ABC Board  
9 other than in obtaining the Debco or the Homer license?  
10 **A. I don't believe so.**  
11 Q. Did you find them easy to work with, personally?  
12 **A. Yeah. I don't -- well, I find them**  
13 **disorienting. I don't think they know what they're**  
14 **talking about half the time.**  
15 Q. If you'd look at Exhibit R, please.  
16 Did you receive this letter from Mr. Rammell?  
17 **A. I probably did.**  
18 Q. Do you recall it?  
19 **A. Yeah.**  
20 Q. Did you take any action as a result of this  
21 letter?  
22 **A. I probably called Brian.**  
23 Q. Now, I said earlier we'd look at a note. And if  
24 you'd turn to Exhibit U, please. If you look on the  
25 bottom, there's some fax dates, December 31.

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1 You've seen this before?  
2 **A. Just recently, yeah.**  
3 Q. You never saw it at the time, December 31?  
4 **A. No.**  
5 Q. Okay. Did you try around this time period to  
6 enter into a different management agreement with  
7 Mr. Rammell, any type of agreement?  
8 **A. I don't know. That would have probably been**  
9 **between him and Gene.**  
10 Q. That's another thing you leave up to  
11 Mr. Greaves? He's kind of your business agent?  
12 **A. Yeah.**  
13 Q. If you'd look at V, Exhibit V.  
14 Is Mr. Ryan Darling an estate attorney in Palm  
15 Desert, California?  
16 **A. Yes.**  
17 Q. Who is Thelma Bendell?  
18 **A. My neighbor.**  
19 Q. Do you live with her?  
20 **A. No.**  
21 Q. Just next-door neighbors?  
22 **A. Well, she's behind me.**  
23 Q. Does she live on your property or you live on  
24 hers?  
25 **A. No. We each have our own property.**

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1 Q. Okay. Did you establish Northern Pacific  
2 Financial Holdings, LLC?  
3 **A. Yes.**  
4 Q. Why did you do that?  
5 **A. For financial reasons.**  
6 Q. And you transferred a commercial building at  
7 1911 East Fifth to that holding company; is that correct?  
8 **A. Uh-huh.**  
9 Q. Did you transfer three lots located at 1922  
10 East 4th?  
11 **A. Yeah.**  
12 Q. That would be 1922, 1910, 411 Sitka Avenue to  
13 the holding company?  
14 **A. Yeah.**  
15 Q. And did you transfer your condo at 333 M Street,  
16 Number 401?  
17 **A. Yes.**  
18 Q. And the home located at 74321?  
19 **A. Yes.**  
20 Q. Did you purchase your home from Thelma Bendell?  
21 **A. No.**  
22 Q. Who did you purchase it from?  
23 **A. I didn't purchase it. It was owned by my past**  
24 **husband, and when he passed away, it came into my name.**  
25 Q. Is that on Covered Wagon Trail?

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1 **A. No. That's Thelma's house.**  
2 Q. Is it on Prospector Trail?  
3 **A. Yes.**  
4 Q. Did you ever have a stamp made of your name and  
5 have -- give Carol authority to use it?  
6 **A. Yeah.**  
7 Q. And did you revoke that authority when you  
8 revoked your power of attorney?  
9 **A. I presume. I don't know if there was anything**  
10 **separate said, but yeah.**  
11 Q. When you say for financial reasons, what were  
12 they?  
13 **A. I went to -- I already had a living trust and I**  
14 **went to him to updo my living trust, and he suggested that**  
15 **I have --**  
16 MR. STIBITZ: I'm going to object on the grounds  
17 of going into attorney-client privilege. I don't think  
18 you should be talking about what you and your estate  
19 planning attorney talked about.  
20 BY MR. VIERGUTZ:  
21 Q. I don't want to know what you and your attorney  
22 talked about, but why did you do it?  
23 **A. Because he suggested I do it.**  
24 Q. Looking at Exhibit V, the first page there, the  
25 appraised value is 355,300; is that correct?

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1 **A. I don't know. What year are you looking?**  
2 Q. All three years. The assessment history, about  
3 the middle of the page.  
4 **A. Oh, the land?**  
5 Q. Yeah. The land and the building is a million  
6 two for at least 2011.  
7 **A. Uh-huh.**  
8 Q. Then if you'd look at Exhibit Z, zebra. It's  
9 way that way.  
10 Is the premises presently for sale?  
11 **A. It's always for sale.**  
12 Q. Is it for sale for the 2.1 million price?  
13 **A. No. This is no longer in existence.**  
14 Q. This real estate listing is no longer in  
15 existence?  
16 **A. No.**  
17 Q. When did it originate, ballpark?  
18 **A. Probably two years ago, maybe.**  
19 Q. Two years ago?  
20 **A. I don't know. I don't remember.**  
21 Q. Did you retain Tower Properties, Pacific Tower  
22 to sell it?  
23 **A. It was Lou Ulmer. He works for that company.**  
24 Q. And when did you take that listing off the  
25 market?

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1 **A. I think he had a three-month listing. Might**  
2 **have been six months.**  
3 Q. You don't have a recollection specifically,  
4 though, when this was?  
5 **A. I probably could find some paperwork, but no, I**  
6 **don't have a recollection.**  
7 Q. You think a couple years ago?  
8 **A. I'm thinking, yeah.**  
9 Q. Is it presently listed?  
10 **A. No.**  
11 Q. What would you sell it for today?  
12 **A. What would I sell it for?**  
13 Q. Uh-huh.  
14 **A. I don't know. I would have to reconsider**  
15 **everything.**  
16 Q. Have you looked at Exhibit X at all?  
17 **A. Yes. I've looked at that. Don't have a clue**  
18 **what it means.**  
19 Q. Okay.  
20 **A. I don't do paperwork.**  
21 Q. You're not in to reading balance sheets and  
22 profit and loss statements, that type of thing?  
23 **A. No.**  
24 Q. You leave that to Mr. Greaves?  
25 **A. No. I would leave that to a CPA.**

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1 Q. And do you have a CPA for Fantasies?  
2 **A. Yes.**  
3 Q. Who is that?  
4 **A. His name is Gary Lutes.**  
5 Q. And have you discussed with him damages in this  
6 case?  
7 **A. No.**  
8 Q. Do you do profit and loss statements?  
9 **A. I don't.**  
10 Q. But does your business do them?  
11 **A. I presume they do.**  
12 Q. You don't review them?  
13 **A. I don't.**  
14 Q. Do you know who does?  
15 **A. The CPA.**  
16 Q. Does anyone within your organization, Fantasies,  
17 review the --  
18 **A. Lon probably did back when he was there.**  
19 Q. When was he there?  
20 **A. He was there up until about probably four months**  
21 **ago.**  
22 Q. Then what happened?  
23 **A. The girl that's managing now did not need him**  
24 **anymore.**  
25 Q. What did he do?

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1 **A. He made spreadsheets and did paperwork. I don't**  
2 **know what he did exactly.**  
3 Q. Because you didn't review it?  
4 **A. No.**  
5 Q. Okay. The exhibit before that is W.  
6 K&L Distributors, they're one of the two  
7 distributors, is that accurate, that you used between --  
8 **A. K&L, Odom. Yeah. There's one for Red Bull,**  
9 **Costco, Sam's.**  
10 Q. The liquor you used Odom or K&L?  
11 **A. Pretty much, yeah.**  
12 Q. After Mr. Rammell left mid August, let's say,  
13 did you continue to use K&L and Odom the account of  
14 Mr. Rammell?  
15 **A. I don't know that.**  
16 Q. And would Mr. Greaves know that?  
17 **A. I would presume he would.**  
18 Q. But you never instructed anyone to do one thing  
19 or another?  
20 **A. No.**  
21 Q. Your answer is "no"?  
22 **A. No.**  
23 Q. Do you, in your normal course of work, review  
24 the K&L and Odom --  
25 **A. I don't.**

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1 Q. You don't. Okay. Do you know who does for  
2 Fantasies?  
3 **A. That would probably be -- at what time now?**  
4 Q. Well, at between October 2012 and August 2013.  
5 **A. That was probably Gene.**  
6 Q. Gene. Okay.  
7 **A. Or maybe Lon. I don't know.**  
8 Q. How did you meet Mr. Trotter?  
9 **A. I've met him years ago. I don't know how I met**  
10 **him. There's just a group of people that know each other.**  
11 Q. Can you tell me how many years ago?  
12 **A. 30.**  
13 Q. Long time?  
14 **A. Long time.**  
15 Q. Did he ever serve as your lawyer?  
16 **A. No.**  
17 Q. We've got about an hour left, I think. Let's  
18 take a short break and come back and we should have her  
19 done by noon.  
20 (Recess taken)  
21 BY MR. VIERGUTZ:  
22 Q. Would you go back to Exhibit U, please. Now,  
23 this is December 31, 2013.  
24 Why didn't you enter into a management agreement  
25 with Rammell at this point in time?

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1 **A. I don't know. Probably because he wouldn't sign**  
2 **one. I don't know.**  
3 Q. Did you present him with one?  
4 **A. I don't know.**  
5 Q. Who would know? Mr. Greaves?  
6 **A. Uh-huh.**  
7 Q. Anybody else?  
8 **A. No.**  
9 Q. Did you ever restrict Mr. Rammell on the amount  
10 of liquor he could purchase between October 2012 and mid  
11 August or so 2013?  
12 **A. I don't know that.**  
13 Q. You never did?  
14 **A. No.**  
15 Q. You know whether you did or didn't, and you  
16 didn't; is that correct?  
17 **A. As far as I know, I didn't. Yes.**  
18 Q. Do you know if Mr. Greaves did?  
19 **A. I don't know if he did, but I'm sure if he was**  
20 **overstepping his bounds, he would.**  
21 Q. What does "overstepping his bounds" mean?  
22 **A. Putting my name in jeopardy by not paying or not**  
23 **having the money to pay, bouncing checks, things like**  
24 **that.**  
25 Q. But isn't he purchasing everything on his

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1 account?  
2 **A. I don't know.**  
3 Q. Did you ever ask Mr. Rammell to put the liquor  
4 license in the name of Travis?  
5 **A. I believe so.**  
6 Q. You personally?  
7 **A. I couldn't tell you that.**  
8 Q. Do you recall telling Mr. Rammell you wanted to  
9 do that because if there were a lawsuit, he didn't have  
10 any assets?  
11 **A. None of us have any assets.**  
12 Q. You have none?  
13 **A. No.**  
14 Q. You don't have -- you don't own anything at all?  
15 **A. No.**  
16 Q. I've got to ask you to reflect on that answer.  
17 You don't own --  
18 **A. Everything I own is in trust. I do not own it.**  
19 **It's in the holding company or in trust.**  
20 Q. Okay. And what assets does Travis have?  
21 **A. Nothing.**  
22 Q. Did you ever ask Mr. Rammell to -- that's the  
23 reason or say that's the reason?  
24 **A. I very well may have.**  
25 Q. Do you know whether your tax returns show

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1 depreciation on the building, the contents?  
2 **A. I'm sure they probably do.**  
3 Q. Do you look at them?  
4 **A. I look at them, but I don't know what I'm**  
5 **looking at. I don't understand taxes any more than**  
6 **paperwork.**  
7 Q. You haven't provided your tax returns to your  
8 counsel?  
9 **A. No.**  
10 Q. Did you -- let me rephrase that.  
11 Did Mr. Rammell, according to your knowledge,  
12 pay credit cards owed by Sands North and yourself out of  
13 the proceeds of October 2012 to August 2013?  
14 **A. I know there was an issue about that, but I**  
15 **don't remember if he paid anything or not.**  
16 Q. You don't have any recollection?  
17 **A. I remember some conversations revolving around**  
18 **that credit card. It was a credit card my sister had run**  
19 **up.**  
20 Q. What's your recollection of the conversations?  
21 **A. I don't know. We just had conversations. I**  
22 **don't know what he talked about. It would have been**  
23 **probably that she's responsible for those that are coming**  
24 **in from Sands North, but they were all for her and her**  
25 **coffee shop.**

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1 Q. For Carol?  
2 **A. Yes.**  
3 Q. He didn't pay any of your personal credit cards?  
4 **A. I don't think so.**  
5 Q. Do you know how much Mr. Rammell paid on the  
6 mortgage for the building between October 2012 and August  
7 2013?  
8 **A. Probably \$12,803 each month, if he was paying on**  
9 **time.**  
10 Q. Did Mr. Rammell do any improvements, physical  
11 changes, anything to the building?  
12 **A. Yeah. I think there was a couple of door**  
13 **changes and things that we had to do downstairs.**  
14 Q. Do you know who paid for those?  
15 **A. No. Probably out of the club.**  
16 Q. But you don't know?  
17 **A. No.**  
18 Q. And are those the only things you recall, a  
19 couple doors?  
20 **A. I'm not even sure about that.**  
21 Q. Okay. You don't have knowledge?  
22 **A. No.**  
23 Q. Is that Mr. Greaves?  
24 **A. I don't know if he would know. We weren't there**  
25 **all the time.**

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1 Q. But you would notice if there were improvements,  
2 wouldn't you?  
3 **A. Well, we've done a lot of improvements in the**  
4 **last two or three years, knocking out, putting in,**  
5 **knocking out, putting in. So the time span I would have**  
6 **to look back and go through records again to see. Oh,**  
7 **there was. There was some kitchen stuff done.**  
8 Q. Why is it that you wanted the license in Travis'  
9 name after it had started in Mr. Rammell's name?  
10 **A. It was going to go into my name or Fantasies'**  
11 **name. Then I didn't want to deal with it anymore. I am**  
12 **not here. I don't want to deal with it. I'm sick and**  
13 **tired of this whole business. I wanted it in someone**  
14 **else's name and a family member would be the most likely**  
15 **person to do it.**  
16 Q. That e-mail -- from Mr. Greaves to Mr. -- excuse  
17 me -- text from Mr. Greaves to Mr. Rammell August 19 where  
18 he says he's going to be in charge of the tills and take  
19 the money, do you have personal knowledge what happened  
20 with the tills that day?  
21 **A. Personal knowledge?**  
22 Q. Yeah.  
23 **A. No.**  
24 Q. You rely on Mr. Greaves?  
25 **A. Yes.**

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1 Q. And Mr. Greaves would have told you --  
2 **A. Yes.**  
3 Q. What did he tell you?  
4 **A. He told me that the money was being taken home**  
5 **at night. There's no accounting for it. We didn't know**  
6 **if the money was in, out, gone, being used.**  
7 Q. Would it be accurate to say that you relied on  
8 Mr. Greaves for that information and you had no personal  
9 knowledge yourself whether that was true or not?  
10 **A. No. I have no personal knowledge.**  
11 Q. Shortens things up when you give the straight  
12 answer. I appreciate that.  
13 What happened to the money between August 20th  
14 and December 31st, 2013?  
15 **A. I don't know what you mean, what happened to**  
16 **what money?**  
17 Q. The club took in money during those months,  
18 correct?  
19 **A. I presume.**  
20 Q. And did you rely on Mr. Greaves to determine  
21 what bills to pay, when to pay them, that type of thing?  
22 **A. Well, if Logan was running it, he was probably**  
23 **paying.**  
24 Q. No, no, no. We're talking August 20th, 2013, to  
25 December 31st.

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1 Would you have relied on Mr. Greaves?  
2 **A. Yes.**  
3 Q. You didn't personally write checks for bills,  
4 anything like that?  
5 **A. No.**  
6 Q. He had signature authority?  
7 **A. Yes.**  
8 Q. Did anyone else between that time period?  
9 **A. To sign my name?**  
10 Q. Uh-huh.  
11 **A. No.**  
12 Q. Sign checks?  
13 **A. No.**  
14 Q. Just Mr. Greaves?  
15 **A. As far as I know, yeah.**  
16 Q. As far as you know --  
17 **A. Well, I don't know. Maybe Lon Trotter was on**  
18 **the account. He might have been put on the account then.**  
19 **He was put on it some time, but I don't know if it was**  
20 **that time period.**  
21 Q. Mr. Greaves would know that?  
22 **A. Yes.**  
23 Q. Do you recall making a profit where you got --  
24 you personally got money as a result of club operations  
25 between August 2013-December 2013?

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1 **A. No.**  
2 Q. You never got any money?  
3 **A. No.**  
4 Q. Why is that?  
5 **A. There was no money to be had.**  
6 Q. Did it operate at a loss every month?  
7 **A. I don't know.**  
8 Q. How do you know there was no money to be had?  
9 **A. Because I didn't get any.**  
10 Q. And is that the only reason you know?  
11 **A. Yeah.**  
12 Q. So is it accurate to say you rely entirely and  
13 trust Mr. Greaves entirely?  
14 **A. Yes.**  
15 Q. If he says you make 10,000 in a month, you  
16 believe it, and he says he makes zero, you believe it?  
17 **A. Yeah.**  
18 Q. Is there any document, again, between mid August  
19 2013-December 31st, 2013, that you review on a monthly  
20 basis to look at how the club is doing?  
21 **A. I do not.**  
22 Q. You don't look at anything?  
23 **A. No.**  
24 Q. Why did you close the club in December 31st,  
25 around that time?



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1 **A. Right there. That document that Logan said to**  
2 **pull the license from the ABC Board.**  
3 Q. But you had the option to enter in a management  
4 agreement it says there, correct?  
5 **A. Yeah.**  
6 Q. And you didn't do that, correct?  
7 **A. I don't think he would.**  
8 Q. But you didn't do that, correct?  
9 **A. Yeah. I guess.**  
10 Q. Do you know?  
11 **A. Well, yeah, it didn't happen. Yes.**  
12 Q. And you never -- you said -- I want to make sure  
13 I am correct. You said you personally never presented  
14 Mr. Rammell with a management agreement?  
15 **A. I didn't.**  
16 Q. And you never authorized anyone to do it for  
17 you?  
18 **A. I didn't specifically authorize, but if Gene**  
19 **would have presented him one, he would have had that**  
20 **authority.**  
21 Q. Did you discuss that with him after -- with  
22 Mr. Greaves after you received a copy of Exhibit U?  
23 **A. I don't know.**  
24 Q. You don't have any recollection at all?  
25 **A. No.**

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1 Q. There were -- let's mark that Exhibit 1.  
2 (Exhibit 1 marked)  
3 Q. Those are discovery responses, and I'm going to  
4 ask you to go to page 6 on the bottom right.  
5 Do you see Mr. Greaves' signature there?  
6 **A. Uh-huh.**  
7 Q. Do you believe that is his signature?  
8 **A. Yeah.**  
9 Q. Okay. If you'd go to page 2, please, and it  
10 says, on response to request for admission number 7, the  
11 response is admitted that "Fantasies and Club Vega were  
12 negotiating Club Vega's purchase of the building and  
13 nightclub until such time Rammell declined to purchase the  
14 building."  
15 When did he decline to purchase the building?  
16 **A. The last time I remember was that August 20th, I**  
17 **believe, conversation when he said he quit, he's out of**  
18 **there. And before that he was obviously not being able to**  
19 **have money.**  
20 Q. He was what?  
21 **A. Not being able to accumulate money, borrow**  
22 **money, find money to buy the building.**  
23 Q. What do you base that on?  
24 **A. His testimony. He never had money. He never**  
25 **came up with any money for anything. How can you buy a**

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1 **building if you can't even buy a liquor license?**  
2 Q. Did Mr. Rammell ever say to you, I do not have  
3 the money to buy the liquor license?  
4 **A. Yes.**  
5 Q. I do not have the money to purchase the  
6 building?  
7 **A. Yeah.**  
8 Q. He said both those things?  
9 **A. He said he had backing, but the backing didn't**  
10 **come through because they were afraid of Carol and her**  
11 **situation.**  
12 Q. Did he tell you that personally?  
13 **A. Uh-huh.**  
14 Q. Do you know when that was?  
15 **A. No.**  
16 Q. Can you give me any ballpark or not?  
17 **A. No.**  
18 Q. Before August 20th, during that conversation, he  
19 never said, I quit, to you?  
20 **A. No.**  
21 Q. Or words to that effect, anything like it's  
22 over, we're going our own ways, bye-bye?  
23 **A. No.**  
24 Q. If you'd go to the next page, page 3, it talks  
25 about interrogatory number 1 towards the -- right under

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1 the middle word there, interrogatories. And it says, in  
2 response, "When Debco, Inc. operated the bar located at  
3 1911 East Fifth Avenue the real property was owned by the  
4 Kathy Hartman living trust."  
5 And that's what you've testified today to,  
6 correct?  
7 **A. Uh-huh.**  
8 Q. That's accurate?  
9 **A. Uh-huh.**  
10 Q. No written lease was executed?  
11 **A. From Debco? There was a lease, but it was not**  
12 **valid.**  
13 Q. "Carol Hartman forged a lease purportedly  
14 between Debco, Inc. and Kathy Hartman," and that's  
15 attached. "But since the Kathy Hartman living trust  
16 opened a property, it was a lessor."  
17 What you are saying is you are a lessor here; is  
18 that accurate?  
19 **A. I guess it is.**  
20 Q. As the Kathy Hartman living trust?  
21 **A. Uh-huh.**  
22 Q. And Debco in turn had a management agreement  
23 with Rammell. That's attached, correct?  
24 **A. Uh-huh.**  
25 Q. Then if you'd go to page 4, please. And if

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1 you'd look at interrogatory number 12 response. It says,  
2 "Logan Rammell and Club Vega declined to purchase the  
3 business under the terms offered by Fantasies."  
4 What were those terms?  
5 **A. I'm not sure.**  
6 Q. There were terms; you just don't remember?  
7 **A. Yeah.**  
8 Q. Were you involved directly in negotiations with  
9 Mr. Rammell on price?  
10 **A. At certain points, yes.**  
11 Q. And did the price change?  
12 **A. I don't know that.**  
13 Q. What do you recall?  
14 **A. I recall that I left that pretty much up to**  
15 **Gene.**  
16 Q. Would it be accurate you don't have any  
17 recollection -- specific recollection --  
18 **A. The price was never to be over three million.**  
19 **That's all I remember.**  
20 Q. Did Mr. Greaves handle the negotiations with  
21 Mr. Rammell for the most part?  
22 **A. Probably.**  
23 Q. Do you recall? And if you do, tell me what you  
24 recall specifically with regard to any negotiation with  
25 Mr. Rammell.

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1 **A. I just don't recall much of anything from that**  
2 **time because I was in such a -- my mind was just out of it**  
3 **completely.**  
4 Q. You had other personal issues going on?  
5 **A. Oh, yeah.**  
6 Q. It says here on page 4 on the bottom,  
7 interrogatory number 15, it says, "Rammell and Club Vega  
8 terminated their agreement with Fantasies on or about  
9 August 18, 2013, and vacated the premises." Then it has,  
10 in parentheses, "Attached are Rammell's termination  
11 correspondence." So if we could go to that, and that's  
12 the last couple pages of this whole thing. I think  
13 there's three pages. Bates numbers 13, 14, 15 in the  
14 bottom right.  
15 Other than these texts, is there any termination  
16 correspondence --  
17 **A. Phone calls.**  
18 Q. The one you're talking about on August 19th?  
19 **A. (Nods head)**  
20 Q. Okay. Other than that, is there any  
21 correspondence?  
22 **A. I don't know.**  
23 Q. You've not seen any?  
24 **A. No.**  
25 Q. And I think you've testified that that call to

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1 you was the first termination notice by Mr. Rammell that  
2 you personally received?  
3 **A. Uh-huh.**  
4 Q. And that's "yes"?  
5 **A. Yes.**  
6 MR. VIERGUTZ: I need to take five minutes.  
7 (Recess taken)  
8 BY MR. VIERGUTZ:  
9 Q. What happened to bank statements that Fantasies  
10 gets?  
11 **A. I presume they're filed away.**  
12 Q. You don't see them?  
13 **A. No.**  
14 Q. Who sees them? Mr. Greaves?  
15 **A. Yeah.**  
16 Q. Did Carol own the building at one point?  
17 **A. She was supposed to be buying it, but it was**  
18 **never turned into her name, because we couldn't.**  
19 Q. Why?  
20 **A. Because of the bank.**  
21 Q. Educate me there, would you?  
22 **A. It would have to be a wrap around because she**  
23 **didn't have any money to finance it. So I had to keep it**  
24 **in my name.**  
25 Q. Didn't Debco own the contents of the building?

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1 **A. I think. I'm not sure how the contract was**  
2 **written up. I'd have to go back over that, because it was**  
3 **by the CPAs again. So this way and that way.**  
4 Q. What contract are you talking about?  
5 **A. Her sale documents.**  
6 Q. Where she sold it to you?  
7 **A. No.**  
8 Q. You sold it to her?  
9 **A. Yes.**  
10 Q. Did Debco own the contents in August of '13?  
11 **A. I don't know. That would be determined probably**  
12 **by a court of law, because this has all been back and**  
13 **forth.**  
14 Q. Back and forth in the legal arena or just --  
15 **A. Well, just attorneys.**  
16 Q. Okay. Will you look at Exhibit F again, and  
17 that's that Coffey Ernouf bill.  
18 **A. Yes.**  
19 Q. Mr. Stibitz may disagree with me, but let me  
20 tell you the way it is with most lawyers. If there's a  
21 conflict, they eat that bill.  
22 Did you have to pay that bill?  
23 **A. This bill?**  
24 Q. Coffey's bill.  
25 **A. I paid whatever they told me I owed.**

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1 Q. They haven't tried to force you to pay any more?  
 2 A. No.  
 3 Q. And to your knowledge, they're not pursuing you  
 4 or --  
 5 A. No.  
 6 Q. -- Fantasies or --  
 7 A. No. I paid everything I owed.  
 8 Q. Okay. Do you assert that Mr. Rammell owes  
 9 Coffey anything, or is that beyond your --  
 10 A. That's beyond my knowledge.  
 11 Q. And you don't care one way or another?  
 12 A. No.  
 13 Q. Because you paid what's yours?  
 14 A. Right.  
 15 Q. And they're not trying to get it from you?  
 16 Okay. That's correct, they're not trying to get it from  
 17 you?  
 18 A. No.  
 19 MR. VIERGUTZ: That's all I have.  
 20 THE WITNESS: Unless they're sending me  
 21 something I don't know about.  
 22 MR. VIERGUTZ: That's fair.  
 23 (Proceedings concluded at 11:38 a.m.)  
 24 (Signature reserved)  
 25

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1 Errata Sheet  
 2  
 3 NAME OF CASE: FANTASIES ON FIFTH v CLUB VEGA  
 4 DATE OF DEPOSITION: 04/17/2015  
 5 NAME OF WITNESS: KATHY HARTMAN  
 6 Reason Codes:  
 7 1. To clarify the record.  
 8 2. To conform to the facts.  
 9 3. To correct transcription errors.  
 10 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
 11 From \_\_\_\_\_ to \_\_\_\_\_  
 12 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
 13 From \_\_\_\_\_ to \_\_\_\_\_  
 14 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
 15 From \_\_\_\_\_ to \_\_\_\_\_  
 16 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
 17 From \_\_\_\_\_ to \_\_\_\_\_  
 18 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
 19 From \_\_\_\_\_ to \_\_\_\_\_  
 20 Page \_\_\_\_\_ Line \_\_\_\_\_ Reason \_\_\_\_\_  
 21 From \_\_\_\_\_ to \_\_\_\_\_  
 22  
 23  
 24 \_\_\_\_\_  
 25 Signature Date

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REPORTER'S CERTIFICATE

1  
 2  
 3 I, DEIRDRE J.F. RADCLIFFE, Verbatim Shorthand  
 4 Reporter, and Notary Public in and for the State of  
 5 Alaska, do hereby certify that the witness in the  
 6 foregoing proceedings was duly sworn; that the proceedings  
 7 were taken before me at the time and place herein set  
 8 forth; that the testimony and proceedings were reported  
 9 stenographically by me and later transcribed by computer  
 10 transcription; that the foregoing is a true record of the  
 11 testimony and proceedings taken at that time; and that I  
 12 am not a party to nor have I any interest in the outcome  
 13 of the action herein contained.  
 14 IN WITNESS WHEREOF, I have hereunto set my hand  
 15 this 19th day of April 2015.  
 16  
 17  
 18  
 19  
 20  
 21 DEIRDRE J.F. RADCLIFFE  
 22 My Commission Expires 5/31/18  
 23  
 24  
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