

Transcript of the Testimony of:

TRANG Q. REED

HAMBY, et al.

vs.

REED, et al.

February 4, 2022

Volume I



IMAGINE
R E P O R T I N G

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN DIEGO

RODERICK HAMBY, an individual,)	
and TRACY REED, an individual,)	
)	
Plaintiffs,)	Case No.
)	37-2020-00023341-
vs.)	CU-BC-CTL
)	
TRANG REED, an individual; and)	
DOES 1 through 25, inclusive,)	
)	
Defendants.)	
_____)	

VIDEOTAPED DEPOSITION OF TRANG Q. REED

San Diego, California

Friday, February 4, 2022

Volume I

Reported By:
CATHERINE A-M GAUTEREAUX
CSR No. 3122
Job No. 64733

PAGES 1 - 151

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF SAN DIEGO

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4
5 RODERICK HAMBY, an individual,)
and TRACY REED, an individual,)

6 Plaintiffs,)

7 vs.)

8 TRANG REED, an individual; and)
9 DOES 1 through 25, inclusive,)10 Defendants.)
11
12
13Case No.
37-2020-00023341-
CU-BC-CTL14 Videotaped deposition of TRANG Q. REED,
15 Volume I, taken on behalf of Plaintiffs at
16 10509 Vista Sorrento Parkway, Suite 450, San Diego,
17 California, beginning at 8:53 a.m., on Friday,
18 February 4, 2022, before CATHERINE A-M GAUTEREAUX,
19 Certified Shorthand Reporter No. 3122.
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23
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25

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18 Also Present:

19 Tracy Reed

20 Roderick Hamby

21 Raza Khan, law clerk

22

23 Videographer:

24 Ellisabeth Logan (remotely)

25

1	INDEX		
2	WITNESS		EXAMINATION
3	TRANG Q. REED		
4	Volume I		
5		BY MR. WEBB	7
6			
7			
8		EXHIBITS	
9			
10	NUMBER	DESCRIPTION	PAGE
11	Exhibit AA	Third Amended Notice of	12
12		Taking Deposition of	
13		Trang Reed with Request	
		for Production of Documents	
14	Exhibit 2	Copilotco U.S. Bank	79
15		statements (5001 - 5041)	
		(not attached)	
16	Exhibit 3	Copilotco U.S. Bank	83
17		statements (5050 - 5147)	
18		(not attached)	
19	Exhibit 4	Copilotco U.S. Bank	84
20		statements (5042 - 5049)	
		(not attached)	
21	Exhibit 5	Copilotco U.S. Bank	98
22		statements (5001 - 5041)	
23		(not attached)	
24	Exhibit 6	Skipped	
25			

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
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20
21
22
23
24
25

EXHIBITS

(Continued)

NUMBER	DESCRIPTION	PAGE
Exhibit 7A	Bill particulars (pages 7A-1 - 7A-5) (not attached)	103
Exhibit 7B	Bill particulars (pages 7B-1 - 7B-5) (not attached)	104

1 San Diego, California, Friday, February 4, 2022

2 8:53 a.m.

3 * * *

4 THE VIDEOGRAPHER: Good morning. My name
5 is Ellisabeth Logan. My employer is V Lux
6 Enterprises. My address is 4395 70th Street,
7 La Mesa, California.

8 Today's date is February 4th, 2022, and
9 the time is 8:53 a.m. Under the California Code of
10 Civil Procedure 2025.60, I am not financially
11 interested in the action and I'm not a relative or
12 employee of Webb Law Group.

13 The deposition of Trang Reed is taking
14 place in person and remotely via Zoom in the matter
15 of Roderick Hamby, Tracy Reed versus Trang Reed.

16 MR. WEBB: I'll ask the court reporter to
17 swear in the witness.

18

19 TRANG Q. REED,
20 having been administered an oath, was examined and
21 testified as follows:

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EXAMINATION

BY MR. WEBB:

Q Good morning. Could you please state and spell your name for the record, please.

A You're asking me?

Q Yes.

A My first name is Trang, T-r-a-n-g; middle name is Quynh, Q-u-y-n-h; last name, Reed, R-e-e-d.

Q And what's your date of birth?

A My date of birth is April 5th, 1984.

Q And have you ever been convicted of a felony?

A I have not.

Q Okay. And what's your highest level of education?

A I have a master degree in business.

Q And where did you obtain your MBA?

A Sorry? I'm sorry?

Q Where did you obtain your MBA?

A National University in San Diego.

Q What year?

A 2010.

Q You understand what today is. I want to make sure that you understand what's going on. I'm sure your attorney has told you about today. I

1 don't want to know anything that your attorney or
2 his staff have ever told you, okay?

3 So what his -- what his office has told
4 you, what he's advised you, if I ever ask you
5 anything today that you think that I want to know
6 something about what he told you, I don't. So
7 please answer the question outside of what he has
8 told you. Does that make sense?

9 A Yes.

10 Q Okay. Today, we're gathering facts.
11 We're trying to understand the history as you best
12 know them. You are human and you are not perfect,
13 and so I may ask you something about the number of
14 people back in 2015 and you may think, well, it was
15 about three to five people. That's what I want to
16 know. You may not remember exactly how many people,
17 but that's okay.

18 So instead of saying, "I don't know," I
19 need your best estimate, because the question would
20 have to do with something you at one point knew.
21 Does that make sense?

22 A Yes. And if I don't remember or I'm not
23 sure, I will give you the answer "I don't remember"
24 or "I'm not sure."

25 Q Yeah. So there is a distinction between

1 an estimate and a guess. An estimate would be what
2 I just said right there, which is something that you
3 have a basis for knowledge of, okay. If I asked you
4 how big your living room is at home, you'd be able
5 to tell me, maybe not to the exact 15 feet and
6 five inches, but you might know it's about 12,
7 15 feet by 20 feet. You might know an estimate
8 because that's something you know about.

9 If I ask you how big the pool table room
10 is in my dad's house, you don't know if my dad even
11 has a pool table room, right? So that would be a
12 guess.

13 A Yes.

14 Q So anything today that I ask you a guess
15 about, I want you to say, "I don't know, because I
16 never knew." But if it's something that you have
17 reason to know something about, you just don't know
18 the exacts, tell me that, "I remember that. I
19 remember some things about it." Tell me your best
20 memory to the extent you can. Do you understand
21 what I'm instructing you on?

22 A I do understand.

23 Q Okay. Thank you. If you don't understand
24 a question I ask, tell me. I don't always ask good
25 questions. And so I want you to tell me and say,

1 "Hey, Mr. Webb, could you ask that a different way?
2 I don't think I quite understand." And I'll
3 rephrase it, 'cause we have lots of time. You
4 understand?

5 A Yes, I do.

6 Q Okay. If you have additional information
7 today -- sometimes later on the day you might
8 remember more and more as you go on -- you can tell
9 me, "Hey, Mr. Webb, that question you asked me an
10 hour ago, I have some additional information."
11 That's fine. I'd rather have it today than later
12 on. Does that make sense?

13 A Yes, it does.

14 Q Because you understand you're under an
15 oath, under penalty of perjury, to tell me the best
16 truth today. But if you change your mind, if you
17 change your testimony, if at trial you say something
18 different, I'm gonna call that into question in
19 front of the court. You understand that?

20 A I do understand that.

21 Q Okay. You're gonna get a booklet in a
22 couple weeks and that's gonna have the opportunity
23 for you to make changes or adjust what you testified
24 to, and you'll just be returning that to your
25 attorney, who will give it to me. Do you understand

1 that?

2 A I do understand.

3 Q You understand that the court reporter is
4 doing her best to type down everything we say. To
5 that extent, it's best if I take a turn speaking,
6 your attorney take a turn to say his objections, and
7 then you take a turn to give your answer.

8 I always want you to give an answer even
9 if your attorney makes an objection, because his
10 objections are not for you; they're for the court
11 reporter to give to the judge.

12 The one exception is, if he reaches over
13 and he tells you, "Don't answer that question."
14 Then, that's different. Then you have a choice of
15 whether to follow your attorney's instruction or
16 not. And I'm gonna ask you, for the court reporter
17 to write down, 'cause you have a choice, whether
18 you're gonna follow his instruction or not. Do you
19 understand?

20 A I do.

21 Q Okay. Have you ever been deposed before?

22 A I have never.

23 Q Okay. Other than our earlier meeting
24 where you and I briefly chatted here, right?

25 A Yes.

1 Q Okay. At times, you're gonna -- because
2 you are a smart, you're an educated woman, you might
3 anticipate what I am going to say. You may
4 anticipate where my questions are headed.

5 However, I want you to do your best to
6 answer my question as I phrased it and not the
7 question you think I want to ask later on.

8 It's very tempting, because you're
9 educated, you're a smart woman, to give me
10 information that I'm not asking for right then
11 because that's just humanity; we do that, we help
12 each other out sometimes. But today I need you to
13 do your best to just answer the question. Is that
14 fair?

15 A Yes.

16 Q Okay. You received -- and I think you
17 walked in today with a piece of paper that's in
18 front of you. It's a stack of papers that are
19 stapled. I think it's a portion of what I'm gonna
20 mark as Exhibit AA, which is the notice to today's
21 deposition.

22 (Exhibit AA marked for identification.)

23 BY MR. WEBB:

24 Q Could you take a look at "AA" for a
25 second, look at all the pages, if you would -- it's

1 the third amended notice -- and see and take your
2 time to look at it, see if that looks familiar to
3 you to be the same list of documents, the same
4 notice you received to appear today. Take your
5 time.

6 A Yeah, it's the same.

7 Q And I'm gonna stick a label on it.

8 And I understand you also have a list that
9 you've handwritten on. I'm gonna include that along
10 with Exhibit AA.

11 A Yes.

12 Q And your attorney will get a copy of what
13 you handwrote on. Is that your handwriting on this
14 Exhibit AA, where it's handwritten as far as what
15 documents you have that are responsive to these
16 categories?

17 A They're all mine, yes.

18 Q And these are true and correct responses
19 to each category, correct?

20 A Correct.

21 Q When you say on here "Tracy and Rod
22 provided," what do you mean by that?

23 A It means when we asked to produce
24 documents, in their response it was in the link with
25 all of the files that you sent me. It's a

1 communication, the email that related to the
2 business.

3 Q Okay. And so what I understand you're
4 saying is for categories such as category No. 1,
5 where we were asking for communications between
6 yourself and plaintiff, that you're saying Tracy and
7 Rod already provided those, so you didn't look for
8 your own?

9 A I don't have it. Yes.

10 Q Okay.

11 MR. OTTILIE: And I think -- and I
12 discussed this with Rod -- what she has is what
13 you've produced. She's not saying -- she does have
14 some communications, but they're the ones you've
15 produced. So we're not producing them back to you.

16 MR. WEBB: I understand.

17 BY MR. WEBB:

18 Q Other than what we produced to you -- and
19 I understand that my clients have given you
20 documents -- did you take -- did you look to see if
21 there were additional documents other than what my
22 client produced?

23 A I did look, and I did not have anything.

24 Q Okay. And that would be for all the
25 categories?

1 A That is correct.

2 Q And where -- when you looked, where did
3 you look for documents? Where were the key places?

4 A For example, the Target card statement, I
5 went online and looked at my bank statement, those
6 statements from the company. They only provide me
7 the last 23 months, so I don't have access anything
8 beyond January 2020. That's one of the example.

9 Q Okay. Other than Target, what other
10 places did you look?

11 A I tried to look back -- look back in my
12 email, trang@ultraviolet.org, trang@copilotco.com,
13 trang@- -- trinity@copilotco.com. And I no longer
14 have the access since we separated.

15 Q And you just mentioned Copilotco. Is that
16 Copilotco, LLC?

17 A The Copilotco, LLC, company email, that is
18 correct.

19 Q Okay. And that's the limited liability
20 corporation, the California entity; is that right?

21 A As my best knowledge, yes.

22 Q And what is Copilotco, LLC?

23 A It is a company that Tracy and I founded
24 in 2010 and it's doing -- it's providing cyber
25 security and internet service.

1 Q You said cyber security and internet
2 service; is that right?

3 A Correct.

4 Q And you said that you've formed this
5 corporation with him in 2010; is that correct?

6 A The company was founded before the LLC.
7 The company was founded in 2009 and it has a
8 different name. So to answer your question, it's
9 the same company, it has a different name. It was
10 not founded in 2010 with the same name. It was
11 founded before that.

12 Q In 2009, what was the name?

13 A Copilotco Consulting.

14 Q And when you say it was formed -- what do
15 you mean by formed? Was it -- was it filed with the
16 Secretary of State or did you draft up some
17 documents or what did you do to form it in 2009?

18 A Tracy and I got -- obtained a dba and do
19 tax -- and filed the tax as our business income. So
20 that's why I understand that we formed a company
21 together.

22 Q When you say, "Tracy and I got a dba,"
23 that dba, was it of yourself individually or was it
24 of an LLC or a corporation?

25 A It's an individual.

1 Q And was that a dba of you as an individual
2 or was that of Tracy as an individual?

3 A I believe it was for both of us as a
4 married-couple business.

5 Q Okay. So you filed a dba, as well as
6 Tracy?

7 A I did not file a dba. Tracy did it.

8 Q Did you sign the dba?

9 A No, I did not.

10 Q Did you ever see the dba?

11 A I believe I have seen it, but I don't
12 remember when.

13 Q Okay. What leads you to believe that it
14 is both your name and Tracy's name on a dba?

15 A I remember I saw a document related to tax
16 or advertising or marketing some sort that's sent to
17 our house saying that Copilotco Consulting, married
18 couple owner.

19 Q Okay. And I didn't ask you a question. I
20 understand your answer. Thank you for that.

21 I didn't ask you a question at the
22 beginning, which I should have. Is there any reason
23 today for less than your best testimony? Reasons
24 would be you didn't get a good night's sleep, you're
25 on prescription medication that affects your memory.

1 Either of those a problem today?

2 A No.

3 Q Okay. Are there any other reasons that
4 you can't testify truthfully today?

5 A No.

6 Q Okay. Thank you. If I told you that the
7 dba was just of Mr. Reed himself, would you have any
8 reason to disagree with that other than what you've
9 said so far?

10 A I don't know how to answer this question,
11 because I would not believe so.

12 Q Okay. That's fine. Now, you mentioned in
13 2010 that the form of the -- of the business changed
14 in 2010 and an entity was formed. Tell me more
15 about what you know about that transition in 2010.

16 A At sometime in 2010 Tracy shared with me
17 that we need to expand the business and Rod gonna
18 join us and we need to form an LLC for the company.

19 Q Did he tell you why he needed to expand
20 the business?

21 A I believe that we have more clients and
22 that's why we need to expand.

23 Q Did you believe you needed to expand at
24 that time, in 2010?

25 A I did not know anything about --

1 technically, in that perspective, about Copilotco,
2 so I have no -- I have no information. I have no
3 idea in that.

4 Q In 2010, what was your role with
5 Copilotco?

6 A I was sending invoices to the clients,
7 make sure that they pay on time and let Tracy know
8 who is owing what.

9 Q And I want to make sure I heard you right.
10 Sending invoices, making sure they pay on time. And
11 what was the third thing you said?

12 A Let Tracy know what clients do owe us the
13 money.

14 Q Approximately how many clients did you
15 have in 2010?

16 A When you say "clients," I would believe
17 that it's -- we have some clients that pay us
18 monthly. We also have clients that Tracy do
19 projects for them. So when you ask that, you want
20 to know the total clients or --

21 Q Sure. You said you were sending out
22 invoices in 2010. How many invoices would you send
23 out, approximately? Would it be on an average of
24 hundreds or a thousand or ten? Approximately.

25 A I would say three.

1 Q Okay. So about three invoices a month?

2 A Yes.

3 Q Okay. So you'd send out the three
4 invoices a month and you'd make sure that they paid
5 their bill?

6 A Correct.

7 Q And you'd tell Tracy if someone didn't pay
8 their bill?

9 A Correct.

10 Q Was there any other role or duty that you
11 had in 2010?

12 A No. That's all Tracy asked me to do for
13 Copilotco back then.

14 Q Would you follow up and would you be the
15 person doing collections if someone was behind on
16 their bill?

17 A Yes.

18 Q So if a client owed you money, would that
19 be Tracy's job or your job to make sure they paid?

20 A It would be my job to make sure they paid.
21 And if I cannot make them pay, I would tell Tracy,
22 "Hey, it has been two, three months" -- or "two,
23 three attempts that I tell them to pay, but they
24 don't." Then Tracy would involve.

25 Q And when you say "two or three attempts,"

1 what would you do in your attempts to get people to
2 pay back in 2010?

3 A I either emailed them or -- most of the
4 time, I emailed them. Very rare that occasionally I
5 called them.

6 Q Okay. So you -- very rarely you called.

7 A Correct.

8 Q You mentioned, as far as changing in 2010,
9 that there was a need to expand 'cause you had more
10 clients and you needed to add another person.
11 What -- what was your understanding of why to add
12 another person?

13 A I did not know or understand about add
14 another person.

15 Q Okay. You said earlier there was a need
16 to expand 'cause you had more clients and to add
17 another person, right?

18 A Tracy told me that.

19 Q And what did you understand by what he
20 told you?

21 A It means that we have a bigger size of the
22 business.

23 Q Did you agree with that assessment at the
24 time?

25 A Yes, I did.

1 Q What made you agree with that at the time?

2 A I always agree with my husband.

3 Q But you're also educated and you have your
4 own thoughts and your own reasoning. Did it match
5 your plans at the time, back in 2010?

6 A 2010, I have worked on myself. I work for
7 Costco, and the business is run -- by majority by my
8 husband.

9 Q So at the time, you were working for
10 Costco full time in 2010?

11 A Correct.

12 Q And you said the business was majority --
13 majority of the time was run by your husband?

14 A Correct.

15 Q And when you say it was majority of the
16 time run by your husband, how long did that go for?
17 In 2010 all the way till the end?

18 A That is correct.

19 Q Okay. And when you say majority run by
20 your husband, what makes you say that?

21 A He does everything. He does all of the
22 technical part of it. He find clients. He talk to
23 clients. He does everything, pretty much.

24 And I do what is considered back admin
25 stuff when he ask me to. Even when making payments,

1 I don't make the decision how much we're gonna bill
2 the clients. He make the invoice for me and send me
3 that template as invoice. I attach that invoice and
4 my job is just send the email to the client.

5 Q Okay. Were you ever an owner of the 2010
6 entity that was formed, where you signed a document
7 giving you shares?

8 A I have never signed any documents.

9 Q Did you ever get any shares without
10 signing for them?

11 A I have -- what do you mean, share?

12 Q Sure. Did you ever get any sort of member
13 certificates or anything indicating that you had a
14 certain percentage of the company?

15 A I have never had any certificate
16 indicating that I have a member of the company.

17 Q And when I say of the company, of what
18 company are you understanding that to be?

19 A We are talking about Copilotco, LLC. I
20 would not imagine we're talking somebody else.

21 Q And how -- so for the bulk of today, when
22 we talk about "the company," is there any other
23 company other than Copilotco, LLC, between 2010 and
24 now that you're aware of?

25 A No, I'm not. I'm not aware.

1 Q And were you ever nominated as an officer
2 of the company with the Secretary of State?

3 A I have never.

4 Q Did you ever sign an operating agreement
5 giving obligations to you and responsibilities that
6 you had to do with the company?

7 A I have never.

8 Q Yet, you did have the responsibility to
9 charge client credit cards for their bills, correct?

10 A When you say "responsibility," does that
11 mean that it's gonna be a must, it's, like, my job?
12 Because I -- I'm doing what my husband told me to
13 do. Some months, I don't have to do it. So I would
14 not say it's a responsibility.

15 Q Did you do that function of charging
16 client credit cards for bills?

17 A I did.

18 Q And when you charged the credit cards,
19 those funds would thereafter appear in the company
20 bank account a couple days later?

21 A Yes.

22 Q And when I say the company bank account,
23 that's Copilotco, LLC's, bank account within a
24 couple days?

25 A Yes.

1 Q And would you have access to that bank
2 account online to view the balance or the payments
3 landing there from your clients?

4 A I did.

5 Q And is that something that you'd regularly
6 check on a weekly basis, the balance or the
7 payments?

8 A I check once a month.

9 Q And when you checked once a month, how
10 often -- would you check once a month from 2010 up
11 until the end or did it change drastically? Was it
12 on average once a month?

13 A I would believe on average once a month.

14 Q And when you would check once a month in
15 the bank account, what would you be looking for?

16 A I usually don't look for anything. When I
17 look for, it's just the total match that I close
18 when I charge the credit card on the
19 (unintelligible) machine, the number match with what
20 we received in the bank account, make sure that the
21 transaction is completed.

22 Q So you would be checking to make sure the
23 credit card charges that you charge your clients
24 match what was actually deposited into the checking
25 account, correct?

1 A Correct.

2 Q Would you be checking anything else?

3 A No.

4 Q Okay. Did you ever prepare any sort of
5 financial statements for the company, like a
6 book- -- as a bookkeeper, like profit and loss
7 statements?

8 A I have never.

9 Q Or balance sheet?

10 A I have never.

11 Q Did you ever work on any marketing
12 projects for the company?

13 A I have never.

14 Q Did you ever prepare a revenue forecast?

15 A I have never.

16 Q Did you ever prepare any sort of a budget?

17 A I have never.

18 Q Did you ever do any sort of programming,
19 technical work, like server administration?

20 A I have never.

21 Q Did you ever market and bring a client to
22 Copilotco?

23 A I did market and potentially bring in a
24 client to Copilotco, but it was not a success.

25 Q Okay. When you say you did market, what

1 did you do to market?

2 A I share with my friends, asking them if
3 they need a server to use. I share with my friends
4 what my husband does, and if they need help with
5 anything that in his knowledge and experience, we
6 can offer help.

7 Q Did any of those friends become paying
8 clients of Copilotco?

9 A Never.

10 Q Now, at the bank, you were there when a
11 bank account was opened for Copilotco Company, LLC,
12 correct?

13 A Yes.

14 Q And when you were there, who else was
15 there?

16 A Tracy.

17 Q Anyone else other than Tracy and yourself?

18 A No.

19 Q Do you remember what bank it was at?

20 A It was U.S. Bank in Poway.

21 Q And what year was that when you opened a
22 U.S. Bank account in Poway for Copilotco?

23 A To be exactly, I don't remember. It's the
24 end of 2010 or beginning of 2011, between those,
25 yeah.

1 Q And that's perfect. Thank you for giving
2 me your best estimate. That's the kind of thing
3 that will make today go faster. I appreciate it.

4 When you were there and you and Tracy
5 signed it, did you also sign so you would have
6 access to the bank account?

7 A I don't remember if I sign, but I do have
8 access to the bank account.

9 Q If I told you that your signature is on
10 the signature card at the bank, would you have any
11 reason to disagree with me?

12 A No.

13 Q Okay. When you had access to the bank
14 account, that was a login and you could see the
15 finances of the bank account, correct?

16 A Correct.

17 Q And you could make transfers or -- or
18 deductions from the bank account?

19 A Yes.

20 Q And you actually have made transfers or
21 deductions from the bank account or taken money out,
22 correct?

23 A Yes.

24 Q And your job at Copilotco, just to make
25 sure I'm understanding it, was to handle the client

1 invoices that were being sent out -- that were
2 prepared by Tracy, and to send those via email and
3 to follow up a couple times if people didn't pay?

4 A Yes.

5 Q Did you ever have any responsibilities as
6 far as paying bills?

7 A Yes, I did.

8 Q And did you have those responsibilities
9 all the way through?

10 A No, I did not.

11 Q When did you have the responsibilities to
12 pay bills for Copilotco, LLC?

13 A It's intermittently during the period of
14 time when I was with Copilotco. Sometimes Tracy and
15 I communicate, if he's too busy to log in to make
16 some payments, I will do it.

17 And if I don't have time -- mind you, I
18 have my son -- we had a son in 2012. So it's
19 between 2012 until we divorced, I'm pretty busy with
20 my son, so sometimes I don't remember to do it and I
21 just tell Tracy, "Hey, we need to pay this bill,
22 this bill," and then he will log in and pay it.

23 Q So between 2011 and the ending date, how
24 often would you be the one paying the bills during
25 the month compared to him? Would it be half the

1 time or three-quarter of the time him or a quarter
2 of the time him? How much, on average?

3 A I will say half, is my best knowledge.

4 Q So half the time he would pay the bills,
5 half the time you would pay the bills. And that
6 would be the bills for the company, or we're talking
7 about you guys personally?

8 A We just pay the bills, and what is
9 obligated for both of us to pay, we pay it, so --

10 Q And are you -- when you say, "what is
11 obligated for both of us to pay," are you referring
12 to Copilotco bills or are you referring to household
13 bills?

14 A I refer to both.

15 Q So you're saying they were jointly done
16 together?

17 A Correct.

18 Q Okay. When you had bills, weren't there
19 bills for Copilotco that Copilotco had for the
20 business, right?

21 A For the business that we own, yes.

22 Q And then there are also bills for your
23 home to care for your child, to run your house.
24 Those are other bills that you have personally,
25 right?

1 A For our community obligation, yes.

2 Q And you had a personal bank account for
3 your personal bills, correct?

4 A No. I have my -- I have my Bank of
5 America account that I -- I own -- like, I have by
6 myself. I joined that account with Tracy at some
7 point. And Tracy has his checking Bank of America
8 on his own. And Tracy and I have the U.S. Bank
9 account with Copilotco together. And those three
10 accounts, we move fund around it.

11 Q Okay. So you had a Bank of America
12 account you added Tracy to. It was considered your
13 account, right?

14 A Yes.

15 Q What were the last four digits of that
16 account number?

17 A Of my account? It ends with 6-something.
18 I don't remember. I don't remember my account.

19 Q We'll call it "the 6 account." Is that
20 okay?

21 A Yes.

22 Q And Tracy's account was -- his personal
23 account was also at Bank of America?

24 A Yes.

25 Q And do you remember the last four digits

1 of his account number?

2 A No, I don't.

3 Q Did you have access to his personal
4 account?

5 A I have never.

6 Q If I told you it was ending in an "8,"
7 would you have any reason to disagree with that?

8 A No.

9 Q So let's call his account "the 8 account,"
10 your personal account at Bank of America is the 6
11 account. Now, the Copilotco, do you remember what
12 the business account ending numbers were?

13 A No, I don't.

14 Q Okay. And when you had personal expenses
15 for your home -- let's say for your child, if you
16 had a birthday party to go to -- where would you
17 spend money from for that birthday party? Would it
18 be from your personal, from Tracy's personal or from
19 the Copilotco account?

20 A It could be the money that we all agree
21 on, and I don't remember right now which account
22 that we take money out to use for it, to be honest
23 with you.

24 Q So between -- let's say in 2011, when you
25 first started the accounts and you added this

1 U.S. Bank account for Copilotco, during 2011, were
2 you spending and writing checks out of that
3 U.S. Bank account to pay for household expenses of
4 your house?

5 A Yes.

6 Q Were you paying for electricity out of
7 that U.S. Bank account in 2011?

8 A Not that I remember.

9 Q Were you paying for your mortgage out of
10 that -- that business bank account for Copilotco?

11 A In 2011?

12 Q Yes.

13 A No.

14 Q Were you paying for your vehicles out of
15 the -- for the gas for your vehicles out of that
16 U.S. Bank account?

17 A In what year, you ask?

18 Q 2011.

19 A No.

20 Q What account was paying for gas for your
21 vehicles in 2011?

22 A It's either Tracy Bank of America or my
23 Bank of America.

24 Q And why was gas being paid for out of your
25 personal account in 2011?

1 A Because that's when I had the money and I
2 have to pay with it.

3 Q And in 2011, what about your home expenses
4 for paying mortgage or rent? Where did you pay that
5 out of? Which account?

6 A It's too long, I don't remember. Most of
7 the time, Tracy pay the mortgage and I don't know
8 what account we use to pay it.

9 Q Do you remember in 2011 that the U.S. Bank
10 account was paying for your household expenses?

11 A I don't recall that.

12 Q Now, did you ever draw cash funds out of
13 the U.S. Bank account of Copilotco's for your
14 personal use?

15 A I don't, not for personal use.

16 Q But you would pull cash out for business
17 use?

18 A I don't remember. We did pull cash out on
19 some traveling that Tracy considers business trips,
20 so we -- I don't know -- when he does tax, I don't
21 know if he claim that as business -- for business
22 purpose or community obligations.

23 Q When you say, "We pulled cash out," was
24 that with your debit card or his?

25 A Both.

1 Q And so let me narrow it and simplify my
2 question a little bit. Did you with your debit card
3 pull cash out of the company bank account between
4 2011 and 2020?

5 A I use my debit card with the U.S. Bank
6 account that under Copilotco, a company that we own,
7 to take cash out, yes.

8 Q What would you use that cash for?

9 A Some for grocery, some to pay -- put back
10 in my checking to pay for our community obligations,
11 Troy school, take classes, a lot of traveling,
12 clothings, foods.

13 Q So when you needed grocery money or some
14 school money or classes for your kids or clothing
15 money, you would take -- use your debit card for the
16 business to pull cash out to make purchases?

17 A No. Only when I don't have sufficient
18 money in my Bank of America.

19 Q And how often a year would that happen?
20 Let's say in 2015, would that happen once a year?
21 Would that happen once a month, couple times a month
22 in 2015?

23 A It's been so long, it's my best knowledge
24 as soon as our business take off and has more income
25 and profit, we agree that we gonna take those money

1 out for our -- and consider -- treat it as profit
2 and use it for our family in anything that we need.

3 Q And what year was it that there was more
4 income, more profits and the business was taking
5 off?

6 A Starting from 2014, we start have some
7 clients, is my best knowledge. And every year we
8 have more and more clients.

9 Q And so your understanding was, in 2014 it
10 started to take off and at that point you started
11 using the ATM more to take cash out of the business;
12 is that right?

13 A That's what Tracy and I agree, yes.

14 Q Okay. And is that what you did starting
15 in 2014?

16 A I believe so, yes.

17 Q And how much cash would you take out on a
18 monthly basis, on average?

19 A For all of the years or --

20 Q On a monthly basis, let's say in 2014,
21 when it started to take off.

22 A I can't give you the exact number on
23 average, but in 2014 -- I don't remember or recall
24 the profits we make, but I -- the last year that I
25 remember, it was the closing year in 2017/16, I take

1 between 2,000 to 4,000, on average, per month out of
2 our U.S. Bank account.

3 Q And that's in cash?

4 A It's either in cash, sometimes in check,
5 yes.

6 Q And that's per month?

7 A Yes.

8 Q And that would be until what time in 2017
9 did you do that?

10 A We -- we keep doing it until we separated.

11 Q When did you separate?

12 A November 26 or November -- I don't
13 remember the exact date. November 2018.

14 Q Okay. And so you took 2- to 4,000 in cash
15 out of the business account per month, on average,
16 until November of 2018; is that right?

17 A On average of what year? The average that
18 I just gave you is --

19 Q Between 2016 and November of 2018, it
20 would be about 2- to 4,000 a month?

21 A Yes.

22 Q And you took that out of the business
23 account with cash, correct?

24 A I took out of the U.S. Bank account we own
25 under Copilotco business, yes.

1 Q And that's the only business account that
2 Copilotco had where you had access to cash, correct?

3 A That is correct.

4 Q And that 2-to-4,000 range per month that
5 you were taking out in cash or checks, that -- at
6 that amount, that 2- to 4,000, that started at that
7 level in 2016?

8 A I remember I pull that much -- a lot more
9 money, yes, 2016 and 2017, that I pull that much.

10 Q What about in 2015? How much, on average,
11 per month do you believe you took out as an
12 estimate, per month, in cash or checks from the
13 company for personal use in 2015?

14 A Probably 2,000.

15 Q What about in 2014, per month?

16 A That's too far. I can't remember.

17 Q That's the year it started to take off,
18 right?

19 A That is correct.

20 Q And that's the year where you and Tracy
21 discussed taking cash or checks out of the business
22 account to use for personal?

23 A No. We have always doing that. We --
24 since -- it's a custom between of us since before
25 Copilotco was created or something. And since the

1 company created and we have the U.S. Bank account,
2 since Day One we already treat it as when we need
3 the money and if the business has money, we will get
4 it out.

5 Q So I asked was that an agreement that you
6 and Tracy formed in 2014 to take cash out of the
7 business account for personal use? And your
8 beginning answer was no.

9 Was there ever a discussion or a document
10 in writing --

11 A No.

12 Q -- where you guys agreed to only take
13 money out for those purposes? No?

14 A We have never.

15 Q Did you ever have a discussion about --
16 orally with -- about how you're going to take money
17 out of the business account for personal use?

18 A No, we have not.

19 Q Okay. Did you ever get an email from him
20 saying, "Please take cash out for" -- "of the
21 business for our personal use"?

22 A No, we have not.

23 Q Have you produced any text messages
24 between you and either one of my clients -- text
25 messages back and forth with either one of them?

1 A The text messages -- we text a lot, yes.

2 Q Have you produced all of those you have?

3 A No, I have not, because I don't save my
4 text messages.

5 Q So right now how often do you delete your
6 text messages?

7 A I don't delete them. I just not save them
8 on my phone 'cause it's out of the memories. And
9 whenever I buy a new phone, it's just gone.

10 Q How often do you buy -- when was the last
11 time you bought a phone?

12 A Last month.

13 Q And when you'd buy a new phone, you didn't
14 bring over your old contacts or transfer numbers
15 from your old phone?

16 A I bring in my contact list, yes. All the
17 phone number, yes.

18 Q And do you have an Apple device or an
19 Android?

20 A I have an Apple device.

21 Q And when you'd buy an Apple device, did
22 you back up from a -- from your Apple account?

23 A Yes.

24 Q And when you backed up, did all your old
25 phone numbers show up with all your contacts?

1 A Yes.

2 Q And in addition, didn't your old text
3 messages show up on your phone?

4 A Yes, but only go into a certain point of
5 time.

6 Q What point in time did they back up to?

7 A I did not check. I can go and check it
8 for you right now if you let me use my phone and see
9 what is the last text message I received from Tracy,
10 like the oldest one.

11 Q Sure, please. And we can go off the
12 record for a second or we'll just be in silence for
13 a second. Just take a look at that if you could.

14 A Okay. It's gonna be a while. I'd say
15 maybe two years or some. I don't know, but it's
16 gonna go -- I'm gonna try to go all the way.

17 Q Have you produced all those text messages
18 to your counsel?

19 A No, I don't, because it doesn't relate to
20 the --

21 MR. OTTILIE: Wait, wait. See, now you're
22 starting to talk about things with me, so --

23 BY MR. WEBB:

24 Q Right. I don't want to know what you said
25 to your counsel. I'm just asking if you've given

1 those text messages that you're looking at and you
2 say it's a lot -- have you given all those to your
3 attorney to give to us?

4 A No.

5 Q Okay. I need you to do that just because
6 it's very important. But as we're talking, if you
7 can keep scrolling back and see how old it goes. I
8 know it will take a while, so I might ask you some
9 questions while you're continuing to scroll.

10 MR. OTTILIE: Well, let's do this. Let's
11 do one or the other.

12 MR. WEBB: Sure.

13 MR. OTTILIE: I mean, I don't have any
14 problem with her doing that, but I don't want her
15 distracted while you're asking important questions.

16 MR. WEBB: Sure. That's fine.

17 MR. OTTILIE: How far back are you?

18 THE WITNESS: I am in 2019.

19 (Discussion Off Record.)

20 THE WITNESS: August 24, 2018.

21 BY MR. WEBB:

22 Q So that's the oldest text you have on that
23 phone with my client Mr. Reed; is that right?

24 A That is correct.

25 Q And is that approximately the date that

1 you obtained a different phone, back in 2018?

2 A I don't remember.

3 Q Did you -- in 2018, did you turn in your
4 phone or did you keep your old phone and get a new
5 one?

6 A I sold it. I think I trade it, yeah.
7 Yeah.

8 Q Traded. Okay. And you use an iCloud
9 account, like, for backup. That's what -- with an
10 Apple device, you transferred from one phone to
11 another phone using Apple's iCloud service, right?

12 A I just doing it this year. Previous that,
13 I usually back up my phone on the laptop and then
14 restore the storage from the laptop, yeah.

15 Q And I'm gonna ask -- I'm gonna give your
16 counsel the name of a software that makes it easy to
17 get that -- that data off your phone. It's called
18 iexplore. And I'll give that to your counsel. It's
19 not an app but it's a computer-based program. But
20 we need a copy just to make sure that what you have
21 matches what I have --

22 A Okay.

23 Q -- so we're all playing with the same deck
24 of cards.

25 A Okay.

1 Q And I reserve my right to ask you
2 questions about those text messages if later on I
3 need to, but for now we're gonna move forward and
4 hopefully get -- get through this. Okay?

5 A Okay.

6 Q You understood in 2014 things were going
7 well, there was more profits and more income,
8 correct?

9 A That is correct.

10 Q But then a few years later there was a
11 substantial amount owed to the data center, correct?

12 MR. OTTILIE: Objection. Vague as to
13 time.

14 BY MR. WEBB:

15 Q And I mentioned a few years later, and so
16 we'll go with your time. When do you believe the
17 amount owed to the data center started growing?

18 A That, I can't -- I can't tell because
19 Tracy is in charge of all of the technical of it.
20 So I don't know when we gonna start growing own debt
21 with AIS.

22 Q And you called it AIS. What is AIS?

23 A American Internet Service. America
24 Internet Services.

25 Q And what were they, as far as you knew?

1 A They are huge building with hot and cold
2 area where we put machine servers in there, where we
3 store all the servers.

4 Q And so why would Copilotco be paying AIS
5 money, to the best of your understanding?

6 A We rent just the space to store all of
7 those machines.

8 Q At one point, did it ever -- was it ever
9 told you by Tracy that Copilotco wasn't able to pay
10 its monthly bill to AIS?

11 A Never.

12 Q Did you ever learn that AIS had a big
13 monthly bill?

14 A I did.

15 Q When was that?

16 A Sometime between 2016 and '17.

17 Q And what was told to you about the debt to
18 AIS in 2016 and '17?

19 A Tracy said that AIS made a big mistake,
20 they did not invoice us correctly. That's all I
21 know.

22 Q Did he tell you, because the invoice
23 wasn't correct, what happened?

24 A No. I did not know why.

25 Q Did he tell you what -- what that caused

1 to happen?

2 A Something to do with bandwidth and the
3 electricity that I have no clue.

4 Q Now, you had access online to see the AIS
5 account, correct?

6 A Yes.

7 Q And you occasionally made payment to AIS
8 through their portal, correct?

9 A Correct.

10 Q And so you would see the monthly balance,
11 correct?

12 A Correct.

13 Q And didn't you ever notice that the
14 balance wasn't being paid in full?

15 A I do.

16 Q When did you first notice that the balance
17 was not being paid in full?

18 A I don't recall it at this time.

19 Q But you do recall that happening?

20 A Yes.

21 Q And can you tell me approximately, was it
22 closer to 2010 or was it closer to 2018 that that
23 balance was not being paid off in full?

24 A I can't -- I don't remember. I don't
25 remember at this time.

1 Q Okay. So it could have been as early as
2 2011 when that happened?

3 A We were not with AIS in 2011. I don't
4 remember. I -- I -- I can't recall it at this time.

5 Q So it could have been even as early as
6 2012 or even '13 when that -- when you couldn't keep
7 up with the balance each month?

8 A Not at that time that I remember.

9 Q And that's what I need from you, is your
10 best estimate.

11 A Yes.

12 Q So it wasn't 2012 or '13, it was after
13 that time, right?

14 A Correct.

15 Q So when was it, approximately? And you
16 can give me multiple years, that's fine. When was
17 it approximately that the balance wasn't able to be
18 paid each month, to the best of your knowledge?

19 A We are behind with the monthly payment
20 intermittently in those years and sometimes the AIS
21 make mistake and they correct it, but it take them a
22 very long time to correct the mistakes in billing.

23 So it happened sometime between -- many
24 times we were paid up and then we caught up and then
25 we owe them again and then they fix it and then we

1 behind again. So it's sometime between 2015 through
2 2017, I would say.

3 Q In 2015 to 2017, when you would be behind,
4 you mentioned it was AIS's mistake. Was it ever a
5 lack of the ability to pay the bill?

6 A No.

7 Q You always had enough money?

8 A Correct.

9 Q And so whenever the bill came in that was
10 from a few months, you guys had enough money saved
11 up to go ahead and pay it?

12 A Correct.

13 Q So you never saw a situation where there
14 was not enough money?

15 A Correct.

16 Q And that would be true even in 2017?

17 A 2017, I believe Tracy told me that AIS has
18 not figured out what happened, so I believe we have
19 money to pay them. I just don't know how much we
20 paid them because they -- they bill us incorrectly.
21 So what we owe and what we pay, if they bill us
22 correctly, we will be able to pay it.

23 Q So in 2017 you were still confused as far
24 as what was owed to AIS, whether it was too much or
25 too little or --

1 A Yes.

2 Q -- you didn't know?

3 A Yes.

4 Q So during 2017, was there ever a time
5 period when you believed that Copilotco did not have
6 enough money to pay its bills?

7 A Can you ask that again?

8 Q Sure. In 2017, you had access to the bank
9 account for Copilotco, correct?

10 A Yes.

11 Q And during 2017, you were actively
12 checking the bank account at least once a month,
13 right?

14 A Yes.

15 Q And sometimes would you check the bank
16 account up to four or five times a month?

17 A No. I usually just check it once a month,
18 whenever I do the -- when I do the -- when you ask
19 me to the average of those years, I give you about
20 once a month. So now I don't remember -- I don't
21 quite understand your questions.

22 Q Sure. So in 2017, you're saying you were
23 checking the bank account balance about once a
24 month?

25 A On average.

1 Q On average. When you withdrew cash, did
2 you ever check before you withdrew cash to make sure
3 there was enough money in the account?

4 A I usually don't because when -- if I
5 withdraw cash, then I will know the balance when I
6 get to the bank, when I withdraw cash. If there is
7 not enough to withdraw, I will know the balance when
8 I'm there.

9 Q Okay. In addition to knowing the balance
10 at the bank, would you ever -- there were checks
11 being written against that account in a checkbook,
12 correct?

13 A Can you ask that question again?

14 Q Sure. In addition to taking cash out of
15 the bank and putting cash in, you would also deposit
16 money in credit cards and take money out with checks
17 sometimes, right?

18 A Correct.

19 Q Because it's a business account, and so
20 business clients would pay with credit cards and
21 money would enter the account and money would exit
22 when you guys wrote checks with it, right?

23 A Yes.

24 Q So when you withdrew cash, did you ever --
25 did you also check the checkbook register?

1 A What is that?

2 Q Did you ever write checks for Copilotco?

3 A I did.

4 Q Was that out of the same account that you
5 were taking cash out?

6 A Yes.

7 Q When you wrote a check, was there a place
8 for you to write a deduction from that account
9 somewhere?

10 A No. We never have that routine. We never
11 save anything.

12 Q So if there was a check written to pay a
13 bill --

14 A Yes.

15 Q -- you wouldn't know if that check was out
16 there needing to be paid because you didn't keep
17 track of that, right?

18 A No.

19 Q Why didn't you keep track of the checks
20 that were being written out of that account?

21 A Tracy has never asked me to.

22 Q And you wrote checks to yourself out of
23 that account, correct?

24 A Yes.

25 Q And did other people have access to that

1 checkbook other than you and Tracy or was it just
2 the two of you?

3 A Just the two of us.

4 Q Would you ever check with Tracy to see
5 what checks he had written out of that account
6 before you took cash out?

7 A What does that mean?

8 Q Would you ever ask Tracy if he used checks
9 to pay someone out of that account before you took
10 cash?

11 A No.

12 Q Why not?

13 A Because Tracy and I talked almost daily
14 and we agree that we gonna take money out whenever
15 we need it for the community responsibilities. And
16 we always report what money we take out as our
17 profit and do tax for our personal tax at the end of
18 the year.

19 And he does that, as well. He never ask
20 me when he does that. Or he write check and pay
21 some employees or pay something, I am not aware,
22 either.

23 Q Okay. Did you ever, in 2017, have an
24 understanding as far as how much money Copilotco was
25 making in net profits per month?

1 MR. OTTILIE: I'm sorry, what year?

2 MR. WEBB: In 2017.

3 THE WITNESS: I don't -- I never have a
4 good -- a good knowledge of how much fixed money
5 that Copilotco make because some months we make more
6 than the others. It depends how much consulting on
7 job that Tracy bring in through Copilotco.

8 BY MR. WEBB:

9 Q Did you ever ask in 2017 to Tracy how much
10 profits there were that specific month so you could
11 take money out without taking too much?

12 A Never.

13 Q Why not?

14 A It's just not in our -- like, in the
15 history. We have never talked 'cause he doesn't
16 talk to me about how much Copilotco make or how much
17 we're gonna take out per month. There is no set
18 amount.

19 Q And in 2018, did you ever communicate
20 about how much money was available to take out of
21 the company account with Tracy?

22 A No.

23 Q So you'd just take the cash out?

24 A Yeah.

25 Q Did anyone oversee or supervise your

1 bookkeeping work with the company?

2 A No.

3 Q Was there any limitation to your ability
4 to take money out when you signed that signature
5 card at U.S. Bank?

6 A Not that I am aware of.

7 Q Did you ever use funds from that account,
8 the Copilotco account, to start a different
9 business?

10 A No.

11 Q Did you ever use funds you took out from
12 Copilotco to invest in the stock market?

13 A No, I did not.

14 Q Do you have a stock market account?

15 A No, I don't.

16 Q Did you ever use those funds to -- but you
17 did use those funds to do some personal things; like
18 you mentioned gifts for your kids or getting your
19 hair done. You would use Copilotco funds for that?

20 A Not for my hair totally.

21 Q So for your hair you would do that expense
22 out of Bank of America instead?

23 A Yes.

24 Q Was -- did anyone ever try to stop you
25 from taking money out of that company bank account?

1 A No.

2 Q When did you no longer have access to the
3 bank account?

4 A When we separated, sometimes in
5 November 2018.

6 Q So you're saying no one ever stopped you
7 from taking money out of the bank account in 2016?

8 A No.

9 Q Did anyone ever tell you to take less
10 money out of the company business account?

11 A No.

12 Q Did you ever tell Tracy Reed that you
13 would ruin him if he didn't let you keep taking
14 money from that business account?

15 A No. That's his word to me.

16 Q I'm sorry? Say that again.

17 A I have never tell him that I'm going to
18 ruin him by taking -- can you ask that question
19 again?

20 Q You said that was his word to you?

21 A Yes. He said that he ruined my life.
22 This is what he told me, not -- the "ruin" word he
23 use that all the time. He --

24 Q And he would say that in response to you
25 saying what?

1 A When we fight, when I -- when we go
2 through the divorce, he accuse me that I'm gonna
3 ruin his life, we're gonna divorce, we're gonna be
4 ruined and then he gonna do it in return. That's
5 when we fight.

6 Q And when would -- when did the fights with
7 that kind of language -- what year was that?

8 A In 2017 to the end of 2017 and through all
9 2018.

10 Q So almost two years of those kind of
11 fights --

12 A Yes.

13 Q -- about ruining him, right?

14 A I am not ruining him. That's not what my
15 language is. I have never said that I gonna ruin
16 him.

17 Q Well, did you ever say that the house will
18 be sold?

19 A Yes.

20 Q And you would tell that to Tracy Reed?

21 A Yes.

22 Q Why would you say that the house would be
23 sold to Mr. Reed?

24 A Because we divorce and we own a house
25 together.

1 Q Did Mr. Reed pay all the living expenses
2 when you were married?

3 A No.

4 Q What living expenses did you pay when you
5 were married?

6 A I pay for Troy school. I pay for grocery.
7 I pay for my credit cards. I give him cash. My mom
8 give me cash, so I give him cash.

9 When he lost his jobs, I pay for the
10 remodeling of the house: The roof, the concrete,
11 the fence, the tile, the living room. I pay for
12 furniture for the house when I first came here.

13 Q And you worked at Costco until what year?

14 A I'm still working for Costco.

15 Q Full time?

16 A Yes.

17 Q And all those items -- groceries, credit
18 card, remodeling, child school, roof, concrete,
19 fence, furniture -- those are monies you paid for
20 either yourself with your Costco monies, with your
21 mom's monies or with monies that you came into the
22 marriage with?

23 A Yes.

24 Q Okay. And how much money did you obtain
25 from your mom?

1 A The total -- total for the whole time that
2 I live with Tracy?

3 Q Yes.

4 A About \$90,000.

5 Q Ninety?

6 A Yes.

7 Q And were those transfers that your mom
8 made to your personal Bank of America account or to
9 his Bank of America account?

10 A It's to both.

11 Q To both?

12 A Yes.

13 Q How much, approximately, was to his
14 personal bank account?

15 A Between 20- and 30,000 in those years that
16 we live together.

17 Q What year was the largest amount of money
18 that went into Tracy's personal Bank of America
19 account from your mother?

20 A As my best knowledge, I don't -- I don't
21 recall at this time.

22 Q Was it closer to 2010 or closer to 2018
23 that the largest amount of money came from your
24 mother to Tracy's personal Bank of America account?

25 A It's vary year by year. I don't remember

1 at this time.

2 Q Would it be fair to say that almost every
3 year, that your mother would send money to Tracy to
4 his personal bank account?

5 A No, it's not every year.

6 Q How many years, approximately, do you
7 believe your mother put money into his personal bank
8 account?

9 A I don't remember. I can't recall at this
10 time.

11 Q Approximately five, ten, one time?

12 A I don't remember. I can't recall at this
13 time.

14 Q Do you have -- have you gotten -- let me
15 rephrase it. Was your mother -- did she ever have a
16 promissory note where she was owed to have these
17 monies paid back to her?

18 A No. It's all gift to us.

19 Q I'm sorry?

20 A It's all gift to us.

21 Q Would your mother send you those monies
22 with a check or with an electronic transfer?

23 A No. It's all cash.

24 Q Okay. And so you would take that cash and
25 you would deposit it into Tracy's personal bank

1 account?

2 A Yes. He -- I'm gonna take a cash, give it
3 to him, and he can do whatever he need to do with
4 it.

5 Q Okay. So you took cash from your mom and
6 you gave the cash to Tracy?

7 A Correct.

8 Q And that was approximately 20- to \$30,000?

9 A Correct.

10 Q And your mom, would she have to take that
11 out of her checking account or her savings account?

12 A No.

13 Q Why not?

14 A She has cash. She doesn't have -- she
15 doesn't have cash in her bank account.

16 Q What does she have in her bank account, if
17 not cash?

18 A I'm sorry?

19 Q If she doesn't have cash in her bank
20 account, what does she have in it?

21 A In her purse, in her room, wherever she
22 put it. I don't know.

23 Q Okay. Did you ever have any -- any
24 witnesses to this 20- or \$30,000 that you gave to
25 Tracy Reed?

1 A My mother.

2 Q Anyone else than your mother?

3 A My brother is aware, but he would not see
4 the transaction in person.

5 Q In addition to the money from your mother,
6 you also mentioned money from -- from Costco and
7 from before the marriage. Would you ever put money,
8 cash from your mom into the business account of
9 Copilotco?

10 A Yes.

11 Q And so there would be cash deposits on the
12 business checking account statement?

13 A Yes.

14 Q And you'll be able to identify which
15 deposits of cash they were?

16 A No, I would not be able.

17 Q Why not?

18 A It's intermittently and in a different
19 time of the period and it's -- I would not -- I
20 don't have a book to record it.

21 Sometimes, if I go to withdraw money or if
22 I take cash out from the ATM or Tracy does and we
23 realize that we don't have sufficient in U.S. Bank
24 account, either Tracy or I will go and deposit money
25 to make that account positive again.

1 Q And so if you take too much money out, you
2 would put it right back in; is that what you're
3 saying?

4 A Yes, but it's not right back in. Whenever
5 we have the money, we always put it back in.

6 Q Okay. How much money do you believe, cash
7 deposits, came from your mother into the business
8 account?

9 A I don't keep tracking, and so I don't
10 remember.

11 Q Rough estimate. A million dollars? A
12 thousand dollars? \$500?

13 A Approximately probably between 5,000 to
14 10,000, in that range. I don't remember.

15 Q Per year or total?

16 A Total.

17 Q I'm sorry?

18 A Total.

19 Q So 5- to \$10,000 of cash from your mother
20 you think you deposited into the Copilotco account
21 between 2011 and 2018; is that correct?

22 A Correct.

23 Q And you believe that that -- those
24 deposits were made to the Copilotco account because
25 you made those deposits in approximately that

1 amount?

2 A No. It's for both of us. Sometimes --
3 sometime I give Tracy cash, too, and I don't know
4 what he use with it. He can deposit partial of it
5 to Copilotco, he can use partial of it to his
6 checking account.

7 I help him out when he lost his job, when
8 he can't -- we can't pay for all of the community
9 obligation bills. That's when my mom come in and
10 help both of us.

11 Q Okay. You mentioned a third source of
12 income, which was your monies from before the
13 marriage. How much money did you bring into the
14 marriage when you began -- when you began your
15 relationship with Tracy?

16 A \$5,000 cash.

17 Q How much did you say?

18 A \$5,000 cash.

19 Q Okay. So 5,000 cash. And that's monies
20 you obtained or had when you met Tracy at the
21 beginning?

22 A When I came here to the U.S.

23 Q Did you deposit monies from your Costco
24 earnings into the Copilotco account?

25 A No.

1 Q Why not?

2 A Because we have never -- like, Tracy has
3 never deposit his to Copilotco from his earning a
4 full-time job. It's not our agreement that way.

5 Q What was your agreement?

6 A We don't really have an agreement. It's
7 just not our routine, not our setup that way. In
8 the beginning he has his earning and it go to his
9 checking, I have my earning that go to my checking
10 and we have the business together.

11 Q And when you say his earning goes to his
12 checking, you're talking about Copilotco work?

13 A No. I'm talking about his full-time job.

14 Q And what was that?

15 A He has always been -- he has always had a
16 full-time job besides Copilotco since I know him.
17 He has never take Copilotco as full time, so he work
18 for many company.

19 Q And what was your understanding of
20 Mr. Reed's full-time job in 2011?

21 A He is -- I don't remember. His job always
22 involve to cyber security, system -- system
23 engineer, anything related to computer.

24 Q And generally you understood him to be
25 full-time employed except for one instance where you

1 remember he lost his job, correct?

2 A Oh, he lost the job many times through all
3 the ten years. 2010 to 2018, he lost his job many
4 times.

5 Q There was one time, though. It seems like
6 you mentioned a few times today where you've
7 mentioned in the singular where he lost his job and
8 there was a time without money coming in from him,
9 correct?

10 A He lost his job --

11 Q But there was a longer period where he
12 didn't find a new job for some time, correct?

13 A He always can find his job. Like, if he
14 lost job, like three months later he have another
15 job. So it's never been like a year or six months,
16 no.

17 Q When you say "always can find a job," what
18 do you mean by that?

19 A Means he lost his job and he always can
20 find a new job.

21 Q Okay. So was there ever a protracted
22 period of time where he needed money from you?

23 A Yes.

24 Q When?

25 A Sometime in 2017.

1 Q What period in 2017?

2 A I don't remember. He change job 2017
3 twice. That's what I recall.

4 Q Do you believe that you are a member of
5 Copilotco, LLC?

6 A I do.

7 Q What makes you believe you are a member of
8 Copilotco, LLC?

9 A Tracy told me.

10 Q What did you understand that to mean?

11 A Mean I own the Copilotco with him.

12 Q How much of Copilotco, LLC, did you
13 believe you owned?

14 A Tracy told me I own 33 percent.

15 Q When did Tracy tell you that you owned
16 33 percent of Copilotco, LLC?

17 A When we -- we founded Copilotco, when
18 we -- when he told me that we're gonna LLC it.

19 Q And what year, approximately, was that?

20 A 2010 when he told me that.

21 Q Did that percentage ever change from
22 33 percent?

23 A No.

24 Q Was it always 33 percent?

25 A That's what he told me and he has not told

1 me differently, so yeah, I believe so.

2 Q Did you ever receive any paperwork showing
3 that you had 33 percent --

4 A No.

5 Q -- ownership? Did you understand that you
6 had duties as a -- as a 33 percent owner?

7 A No.

8 Q Who owned the other 67 percent?

9 A Tracy told me that, "We're gonna LLC a
10 company. Rod gonna join us. You're gonna have 33,
11 Rod gonna have 33, and I'm gonna have 34."

12 Q And you say "Rod." What do you mean by
13 that?

14 A Rod is Tracy best friend.

15 Q Mr. Hamby?

16 A Yeah.

17 Q Okay. Did you ever see any documents to
18 reflect and confirm that Mr. Hamby had 33 percent?

19 A No.

20 Q Do you dispute or do you agree that he has
21 33 percent?

22 A I agree.

23 Q Do you understand that you have -- as an
24 owner of the company, you have a duty to that
25 company?

1 A No, I don't.

2 Q Do you believe you have any duty to the
3 Copilotco, LLC, as an owner?

4 A I did not before. I do now, after the --
5 the lawsuit.

6 Q What -- what do you understand your duty
7 is?

8 MR. OTTILIE: Well, objection. Calls for
9 a layman opinion.

10 BY MR. WEBB:

11 Q Go ahead. What's your understanding?

12 A Of?

13 Q Of your duty to the company.

14 A I don't understand my duty to company. I
15 just do whatever Tracy told me to.

16 Q Do you believe that there is any sort of a
17 mistake made by Mr. Hamby to the company?

18 A Mistakes?

19 Q Yes.

20 MR. OTTILIE: Objection. Vague,
21 ambiguous.

22 BY MR. WEBB:

23 Q Anything he's ever done wrong to the
24 company?

25 A No.

1 Q So to the best of your recollection,
2 Mr. Hamby has made no mistakes with the company,
3 correct?

4 A I don't know anything about what Mr. Hamby
5 does for the company. So it's my best knowledge I
6 don't have sufficient knowledge to tell you that. I
7 don't know if he did any damage for the company
8 through his job or anything. I don't really
9 communicate with him.

10 Q Do you believe Mr. Hamby ever took out any
11 money for his personal use from the company?

12 A No.

13 Q Did you ever see him take anything
14 physically for his personal use?

15 A No.

16 Q Do you believe Mr. Hamby had access to the
17 bank account for Copilotco?

18 A No.

19 Q Why not?

20 A 'Cause Tracy never put him in at the
21 beginning.

22 Q Did you ever see any -- any checks being
23 written to Mr. Hamby that you believe were improper?

24 A Not that I am aware of.

25 Q Okay. Do you believe -- with Mr. Reed, do

1 you believe Mr. Reed has done anything improper with
2 Copilotco?

3 A What do you mean, "improper"?

4 Q Something that you don't agree that should
5 have been done.

6 A He took me off of the bank account that we
7 join together, U.S. Bank account, and then he put me
8 in as a signer -- a signer. That's what the bank
9 teller told me. I was a signer on that account.

10 He took me off, he put me on, he took me
11 off again and he put me on and then he took me off
12 again, and he did not tell me when he did that.

13 Q And so in 2018, when you separated, did
14 you believe at that time you were a signer on the
15 U.S. Bank account or you were not a signer?

16 A When? In 2018?

17 Q In November of 2018 you separated from
18 Mr. Reed, right?

19 A Yes.

20 Q And at that point, were you a signer on
21 the Copilotco U.S. Bank account?

22 A I was no longer a signer. I had no access
23 or anything to that account.

24 Q When was the last time you did have access
25 to the U.S. Bank account?

1 A Sometime in November, that -- right before
2 he took me out of. So I don't know the date exactly
3 when he took me off.

4 MR. OTTILIE: When you say November, what
5 year.

6 THE WITNESS: 2018.

7 BY MR. WEBB:

8 Q And that's when you were doing
9 transactions using money of Copilotco -- the last
10 time you were doing that was in November of 2018?

11 A I would think so, right before --
12 sometimes in November. I don't remember. It's my
13 best recall right now. I don't remember.

14 Q So within one or two months of 2018 was
15 the last time you used Copilotco for your personal
16 purposes for money, correct?

17 A I use the U.S. Bank account, which I was a
18 signer, which I own the company and I use -- I
19 withdrew the fund from that account for my expense
20 and for our community expenses sometimes in
21 November, yes, right before I was removed as a
22 signer.

23 Q And even in December of 2018, didn't you
24 still use that account?

25 A No. I don't have any access to that

1 account anymore.

2 Q How about in January of 2019. Didn't you
3 still use that account in January of 2019?

4 A No. I have no access to that account.

5 Q When you say "no access," what did that
6 mean to you, "no access"? How did you believe you
7 had no access?

8 A I can't go to the bank and do any
9 transaction. They told me I was removed as a
10 signer. I can't log into online account to see
11 what's going on, if Copilotco was still making money
12 or if we are in debt. I have no access at all to
13 anything.

14 Q So you're saying your debit card wouldn't
15 work anymore?

16 A Exactly.

17 Q And did you have access to the checks?

18 A No.

19 Q Did you have access online to the online
20 account?

21 A No.

22 Q So all that was removed?

23 A Correct.

24 Q And that's in November of 2018?

25 A Correct.

1 Q Why did you have a personal Bank of
2 America account? Why not just have one account?

3 A Because I am a human being. I have my own
4 income and expenses and I -- when I came here, Tracy
5 told me to open an account.

6 Q But you were spending monies out of the
7 Copilotco account for your human being expenses,
8 right? You were taking money out to pay things like
9 clothing and groceries and stuff, right?

10 A I was using my money, too, because
11 U.S. Bank account was --

12 Q Did you hear my question? You want her to
13 read it back to you?

14 A Yes.

15 (To the Reporter) Please read back to me.

16 (Record read as follows: "Q. But you
17 were spending monies out of the Copilotco
18 account for your human being expenses,
19 right? You were taking money out to pay
20 things like clothing and groceries and
21 stuff, right?")

22 THE WITNESS: Yes.

23 BY MR. WEBB:

24 Q Okay. And so if you're taking money out
25 to pay for groceries and clothing out of the

1 Copilotco account, what's the purpose of having your
2 own Bank of America account?

3 A I have that Bank of America account since
4 I came into the U.S. in 2007.

5 Q I understand when you got it. I'm asking:
6 What's the purpose of your Bank of America account.

7 MR. OTTILIE: What did you use it for?

8 THE WITNESS: I use that also for the same
9 purpose: For gas, for my hair, for clothing, for
10 Troy school, for Tracy clothes, shoes.

11 BY MR. WEBB:

12 Q For the same thing?

13 A For the same thing, yes.

14 Q So you would use -- so an expense for
15 clothes or shoes or for school or for groceries,
16 they can come out of either account. To you it made
17 no difference, right?

18 A Correct. Yes.

19 Q And did you identify that those monies
20 coming out of the business account were to be taxed
21 or were to be 1099ed?

22 A I don't recall what a 1099, but I know
23 that we will tax for whatever we take out as our
24 income.

25 Q How do you know that you would pay tax on

1 what you would take out as income?

2 A Because every year Tracy and I go to the
3 accountant and we sit down with him and identify all
4 of the transaction we make out of the Copilotco when
5 we do tax for our -- our personal income tax and for
6 the business tax. And we tell him -- how much we
7 take out, we pay tax on it. And we still -- yeah.

8 Q And so you had a tax bill because of what
9 you had taken out of Copilotco, correct?

10 A Yes. Yes.

11 Q And you had that problem a few years at
12 the end, correct, in 2017 and '16, and '18?

13 A '15, too. '15, yeah.

14 Q And when you had a problem in '15, you had
15 to deal with it in 2016, the year after, when you
16 did your taxes, right?

17 MR. OTTILIE: Yeah, I'm confused. So I'm
18 gonna assert an objection as to the meaning and the
19 phrase "problem."

20 MR. WEBB: Sure.

21 BY MR. WEBB:

22 Q You mentioned that you had to pay taxes on
23 it.

24 A Correct.

25 Q Was that a problem or was that something

1 that you had to do back in 2012?

2 A No.

3 Q Why not?

4 A Because back then Copilotco did not profit
5 as much, so we did not take as much out for our --
6 and claim as our profit and income.

7 Q What about 2013? Did you take out profit
8 and have to claim it as income in 2013 from
9 Copilotco?

10 A I believe so, yes.

11 Q Okay. So you do remember that happening
12 back then?

13 A We have always have an income tax for
14 Copilotco for years back, way back. We always do
15 that. It's just how much.

16 Q Okay. But was it -- was it a smaller tax
17 bill back in 2012 and '13 compared to in 2016 and
18 '17?

19 A Yes.

20 Q How much smaller?

21 A I don't recall at this time.

22 Q Can you give me an approximate? Was it
23 like \$100,000 tax bill or was it a \$5,000 tax bill?

24 A I can't give you a number. There is a
25 difference, but I can't give you a number when I

1 don't have that number in my mind.

2 MR. OTTILIE: I want to assert an
3 objection. I'm not clear that they ever got a tax
4 bill for the business. They owed taxes, but I don't
5 know if it's distinguished.

6 MR. WEBB: Sure.

7 BY MR. WEBB:

8 Q Did you ever understand -- did Tracy ever
9 express a concern to you about the business account
10 you should use for business expenses and the
11 personal account you should use for personal
12 expenses? Did that conversation ever happen?

13 A No. He only share with me that whatever
14 that we take money out from the business we gonna do
15 tax later and make clear that we gonna claim as our
16 profit of our joint income. That's my
17 understanding.

18 Q So you don't remember ever talking about
19 that as far as commingling?

20 A No.

21 MR. WEBB: Rather than attach the bank
22 statements and the tax documents to the transcript,
23 I'm gonna ask counsel if you'll agree that we can
24 refer to those documents by Bates number and
25 incorporate them by reference but not attach them to

1 the transcript.

2 MR. OTTILIE: Yeah, that will be fine.

3 MR. WEBB: I also propose that in the
4 other depositions that we use the same exhibit
5 numbers and we'll just keep on going, so at trial we
6 have the same number of exhibits as we have
7 depositions, if it's agreeable to you. You don't
8 have to agree now, but that's what I would propose.

9 So I'm gonna hand you what I've marked as
10 Exhibit 2. It's Bates-numbered -5001 through -5049
11 of Reed.

12 MR. OTTILIE: Do you have a copy for me at
13 this point, for us?

14 MR. WEBB: You want to share if you can in
15 the middle if that helps.

16 MR. OTTILIE: Okay. So you are gonna
17 designate these as exhibits but not attach to the
18 transcript. Is that the point?

19 MR. WEBB: Yes.

20 MR. OTTILIE: Okay. And we're gonna refer
21 to them --

22 MR. WEBB: -- by Bates number.

23 MR. OTTILIE: Okay. And what's the
24 inclusive numbers on Exhibit 2?

25 MR. WEBB: Sure. -5001 through -5049.

1 MR. OTTILIE: You want to identify by date
2 or --

3 MR. WEBB: Sure.

4 MR. OTTILIE: November 2016.

5 MR. WEBB: Yeah, November 2016 all the way
6 through 2019. And these are the Copilotco U.S. Bank
7 statements.

8 (Exhibit 2 marked for identification.)

9 BY MR. WEBB:

10 Q Take a moment, 'cause there is 49 pages
11 here. I don't need you to look at each and every
12 transaction, but do take a flip-through and see if
13 this generally looks to be the U.S. Bank business
14 statements that you had access to online.

15 MR. OTTILIE: Are you asking her if this
16 is inclusive of all of those statements or just
17 generally they appear to be ones --

18 MR. WEBB: Generally they appear to be
19 ones that she's familiar with.

20 MR. OTTILIE: So there might not be some
21 in there, but you don't have to look at the dates to
22 satisfy yourself.

23 Can I take a quick restroom break, three
24 minutes?

25 MR. WEBB: Sure.

1 Madam Court Reporter, can we go off the
2 record -- Madam Videographer?

3 THE VIDEOGRAPHER: We are going off the
4 record. The time is 10:31 a.m.

5 (Recess.)

6 THE VIDEOGRAPHER: We are going back on
7 record. The time is 10:40 a.m.

8 BY MR. WEBB:

9 Q Did you have anything during your break
10 that you want to change or add about your testimony
11 that you've said so far?

12 A No.

13 Q Okay. And you speak very softly. I
14 understand that the court reporter will probably ask
15 you to make sure that's audible for her.

16 A Yeah. I try to speak louder 'cause
17 whenever I speak louder, the air got up into my
18 mask. It just go up into my eyes and it's a little
19 bit --

20 Q I understand.

21 A -- difficult.

22 Q In 2017, you mentioned that Mr. Reed had
23 lost his job at one point during the year and that
24 funds -- money was tight; is that right?

25 A Yes.

1 Q And you started to argue about money; is
2 that right?

3 A We never argue about -- like, money was
4 not a topic for us to fight.

5 Q Well, you mentioned one of the topics
6 would be losing the home or you'd have to sell the
7 home, right, if there is a divorce?

8 A There was a time that where we short of
9 money, we could not pay the bills and we late on the
10 bills all the time.

11 Q When was that?

12 A When Tracy lost a job. Sometimes in 2017.
13 I don't remember.

14 Q How many months were you late and you
15 couldn't pay the bills in 2017?

16 A Only one month. Never be two, because my
17 mom always step up and help us.

18 Q And so he was able to get a job, you said,
19 fairly quickly. So within a couple months, he had a
20 job again in 2017?

21 A Correct.

22 Q But the fighting continued into 2018 --

23 A Yes.

24 Q -- correct?

25 A Yes.

1 Q And when you were short on money in 2017,
2 did you stop pulling money out of Copilotco's
3 business account or did you continue to pull monies
4 out of that account?

5 A We continue pull out the money from
6 U.S. Bank Copilotco account.

7 Q Was the Copilotco company still making a
8 good amount of money to be able to support cash
9 withdrawals in 2017?

10 A Yes.

11 Q I handed you an Exhibit 2, which is Bates
12 No. -5001, REED, through -5041. I said before -49,
13 but I think it's just through -41.

14 Do these look to be true and correct
15 copies of the Copilotco U.S. Bank account from
16 November of 2016 (sic) through, it looks like,
17 March 2016?

18 A I have January 2016 through November 2016.

19 Q Okay. And these were the years where you
20 had access online to the bank account and you were,
21 to some degree, managing the bank account, correct?

22 A I do not manage it. The bank account --
23 U.S. Bank account does not need to be managed. Both
24 Tracy and I have access to it, so I don't understand
25 what you mean, "manage."

1 Q I think you explained earlier as far as
2 what your role or duties were with the bank account.
3 But this is that bank account we were talking about
4 earlier, the U.S. Bank account?

5 A I mentioned you the three bank account.
6 And my role with this bank account involve with the
7 company. Was that what your question is?

8 Q Right. And this is that same bank
9 account, this is the Copilotco U.S. Bank account
10 that you've been talking about earlier, correct?

11 A Correct.

12 (Exhibit 3 marked for identification.)

13 MR. WEBB: I'm gonna hand you Exhibit 3,
14 which is Bates No. REED -5050 through REED -5147.
15 Take a moment to look at these.

16 THE WITNESS: These from April '17?

17 MR. OTTILIE: Pardon me?

18 THE WITNESS: These from April -- so it's
19 from January '17 until December 2018.

20 BY MR. WEBB:

21 Q So would it be fair to say that Exhibit 3,
22 this Bates No. -5050 to -5147, that that comprises
23 the 2017 and '16 bank statements for Copilotco?

24 A Yeah.

25 Q And that looks -- those look to be

1 familiar as far as the statements that you had
2 access to during those years, correct?

3 A Yes.

4 Q And then I'm gonna hand you what I've
5 marked as Exhibit 4. And that's Bates No. -35042 to
6 REED -35049 and then separately -5148.

7 MR. OTTILIE: Can you read those numbers
8 again? I'm sorry.

9 MR. WEBB: Sure. -5042 to -5049. And
10 separately, the second section of the same exhibit
11 is -5148 through -5149. I'm sorry, it looks like
12 -5148 and -5149 are part of Exhibit 5.

13 MR. OTTILIE: So Exhibit 4 just got
14 smaller and Exhibit 5 appeared?

15 MR. WEBB: Yeah, I apologize. Let's deal
16 just with Exhibit 4 right now. Exhibit 4 will just
17 be that first batch of numbers, so -5042 through
18 -5049. So that's Exhibit 4.

19 (Exhibit 4 marked for identification.)

20 BY MR. WEBB:

21 Q So same question on Exhibit 4. You can
22 take a look at that to see if it's the same thing.
23 Does that look familiar to you that those are the
24 statements you had access to in 2019, this time
25 period being January of 2019 through March 2019?

1 MR. OTTILIE: So the question is: Do
2 these look like that account or an account she had
3 access to?

4 MR. WEBB: Both.

5 MR. OTTILIE: (To the Witness) What were
6 you gonna say?

7 THE WITNESS: This is January '19. This
8 is what I have -- I think I retrieved from -- a copy
9 from the accountant, but I don't have access to this
10 account from this date.

11 BY MR. WEBB:

12 Q So I believe your testimony was that the
13 U.S. Bank account for Copilotco, that you don't
14 currently have access to that account at the bank
15 because you've been removed?

16 A Correct.

17 Q This looks be true and correct as far as
18 during 2018 you had access to that account, but
19 you're saying during these months, in January and
20 February 2019, your belief is that you did not have
21 access or take any monies out in 2019, correct?

22 A I did not have -- I have not had access to
23 that U.S. Bank for Copilotco account since
24 November -- exact date I don't know. I'm not aware
25 of it -- 2018.

1 Q If you'll look at Exhibit 4, page -5045,
2 it's a check made out to you for \$800.

3 A This, I'm not aware of. I did not do
4 this.

5 MR. OTTILIE: He didn't ask you a
6 question. He asked you to look at it. Now he's
7 gonna ask you the question.

8 THE WITNESS: Okay.

9 BY MR. WEBB:

10 Q So this check -- did you deposit this
11 check for \$800 in your account in January or -- on
12 or after January 4, 2019, when it was written?

13 A This, I am not -- I'm not recall at this
14 time. I don't remember.

15 Q Okay. So you don't remember, but could it
16 be possible that in January 2019 you actually did
17 have access to that account?

18 A I did not have access to the Copilotco
19 account.

20 Q How is it that you were -- who caused this
21 \$800 check to be written to you in January 2019?

22 A I don't know who wrote this check. I did
23 not have the access to the account.

24 Q Okay. You see on the check it says, "This
25 check has been authorized by" with a signature on

1 file. So you're saying that you did not authorize
2 or cause this check to be issued by U.S. Bank?

3 MR. OTTILIE: Hang on.

4 Can you tell me where you're referencing?

5 MR. WEBB: Sure. Same page.

6 MR. OTTILIE: Oh, I see. In the lower
7 right-hand side?

8 MR. WEBB: Right.

9 MR. OTTILIE: (To the Witness) Can you
10 read that?

11 THE WITNESS: Yeah.

12 BY MR. WEBB:

13 Q Did you deposit that check for \$800 in
14 your account in January 2019?

15 A I don't recall. I can't -- I can't tell
16 you at this moment.

17 Q How long after you were separated from
18 Mr. Reed did you continue to take monies from
19 Copilotco?

20 A Tracy help me to pay bills after we
21 separated, he transfer me money. So I don't know if
22 that money was the money from Copilotco U.S. Bank or
23 the money from his checking account. So that, I
24 don't know. So if you ask the question like how
25 long I continue to use, I don't know.

1 Q So you said he transferred money to you.
2 That's electronically or was that with a check that
3 he gave you?

4 A He help me to pay bill. He doesn't
5 transfer me money. He helps me to pay the community
6 obligations bills that we owe both, both of us.

7 Q So you're saying that Mr. Reed, after you
8 were separated, would pay bills directly without
9 giving you money?

10 A Correct.

11 Q And what bills would Mr. Reed pay after
12 you were separated, directly?

13 A Yes. To answer your question, because you
14 said that only help me pay the bill directly, he
15 also give me cash to have -- we have a choice of
16 private school, day care whenever I'm short, yeah.

17 Q And how much was that, per month?

18 A I don't remember. It's a few hundred
19 dollars per month.

20 Q Was his portion a few hundred or was the
21 total bill a few hundred per month?

22 A Sometime this is partial, sometime this
23 is -- I believe that we split half and half, so it's
24 his portion, half of portion of the ESS, of the day
25 care.

1 Q And how much was the day care per month?

2 A I don't recall. It's different every
3 year; every month, every year.

4 Q In 2019, do you believe it was closer to
5 \$500 or \$220?

6 A Maybe 300. 300.

7 Q And Mr. Reed would pay half of that in
8 2019 after you were separated?

9 A Correct.

10 Q And he would pay that to you in cash
11 sometimes?

12 A Yes. He gave me cash.

13 Q Okay. And did you have access to the -- I
14 believe your testimony is that you did not have
15 access to see, like, the nine overdrafts that were
16 charged to the Copilotco account in February 2019,
17 correct?

18 A That is correct.

19 Q Did you see, before you were separated
20 from Mr. Reed, numerous overdraft fees with the
21 Copilotco account?

22 A No.

23 Q But you were still looking at the account
24 every month, correct?

25 A I did not have access. How can I look at

1 the account?

2 Q Let me rephrase it. In the immediate
3 months prior to your separation, you still had
4 access to the Copilotco account with U.S. Bank?

5 A Correct.

6 Q And you were still looking at it
7 approximately once a month, correct?

8 A Toward to our separation, I don't -- I
9 don't think that I log in to look at that bank
10 account as often. I don't recall, to be honest with
11 you, but I would keep saying once a month, on
12 average, all through the years. But I can't recall
13 how many times I log in, yeah.

14 Q But you sometimes did account withdrawals
15 for 200, 700 or \$3,000 during November of 2018,
16 right when you were separated, right, from the
17 Copilotco account?

18 A Yes.

19 Q And Mr. Reed authorized that to be taken
20 from the business?

21 A I don't need his authorization to take
22 cash out. I have never had that with him.

23 Q Okay. And did you understand that at that
24 time, in 2018, that Copilotco was still doing
25 business or did you understand that it was out of

1 business?

2 A I understand that it's still doing
3 business.

4 Q Okay. Did you look -- and did you look at
5 the checking account in that month -- for example,
6 in November -- to see that deposits were sufficient
7 to take withdrawals out and pay the business bills?

8 A What my belief is that when I take the
9 fund out and if I'm still able to take fund out from
10 the business to be able to pay bills, I have never
11 have a concern that we take too much out that we
12 can't pay bills.

13 Q But the servers -- those servers that were
14 used to make money, those got pulled and were pulled
15 into your Copilotco office and they weren't being
16 used during the last two months before you
17 separated, right?

18 A I don't know about that.

19 Q You don't know about that?

20 A No.

21 Q Did you ever know, during the last few
22 months of your relationship with Mr. Reed, that the
23 business, Copilotco -- the operations ceased or
24 changed?

25 A No, I did not know that.

1 Q Was there an unusual amount of machinery
2 in the office during -- months before you separated
3 with Mr. Reed?

4 A Several months before separation, it's
5 very rare for me to go into the office, so I don't
6 know what's in there.

7 Q Do you believe you ever went into the
8 office within one or two months before you
9 separated?

10 A I don't recall it at this time.

11 Q What about just after the separation? Did
12 you visit Copilotco's office just after the
13 separation?

14 A I came in there once, yes, I did.

15 Q Why did you visit Copilotco's office once
16 after the separation?

17 A So I can take my personal documentation --
18 paperwork, like birth certificate and my passport
19 and my school transcript and all my mother's and my
20 brother's immigration documents out of that office.

21 Q So that was after the date of separation,
22 you went to the office to get paperwork?

23 A Not the business. That's our office that
24 we build together that he lock me out. And I had to
25 come in there when he is in there with Troy.

1 Q Okay. That's a home office, right?

2 A Correct.

3 Q So after separation you went to the
4 Copilotco's office at Mr. Reed's house's home
5 office?

6 A That's our office. Our home office.

7 Q And you took things at that time, you're
8 saying, that belonged to you; is that right?

9 A That is correct.

10 Q Did you text Mr. Reed and tell him that
11 you wanted those things before you went to his
12 house?

13 A I don't recall. I mention him that he
14 need to let me in the office to take those documents
15 out.

16 MR. OTTILIE: Were you living in the house
17 then?

18 THE WITNESS: I did, yeah. I live
19 together with him.

20 MR. OTTILIE: They lived together after
21 separation.

22 BY MR. WEBB:

23 Q How long after separation did you live
24 together?

25 A Until we divorce. Until the divorce

1 finalized.

2 Q And when was that?

3 A The divorce finalize in January 8, 2020.

4 I moved out of our house on February 9, 2020.

5 Q So within a month after the divorce
6 finalized, you moved out?

7 A Correct.

8 Q So you were taking money, while you were
9 still living in the house, from Copilotco sometimes
10 up to \$5,000 a month; those examples we saw in
11 November 2018, it was 3,000 and 2700.

12 What did you use those -- those monies for
13 that you took from Copilotco? For example in
14 November 2018. This is -- I'm specifically
15 referring to Exhibit 3, Bates No. -5142. So if you
16 look at Exhibit 3, Bates No. -5142 --

17 A What is your question, again?

18 Q So you had separated during this month,
19 November 2018, correct?

20 A Yes.

21 Q What day did you separate in 2018?

22 A When we file for divorce, which is the end
23 of November, which I don't remember exact date.

24 Q Was it after Thanksgiving?

25 A I don't remember the date we file for

1 divorce.

2 Q So within one to two weeks before your
3 filed for separation, you took out \$3,000 and you
4 also took out \$2700 in cash from the business
5 account?

6 A It is still our U.S. Bank account that we
7 join together back then for what I -- for what I
8 understand.

9 Q Did you use the cash for business
10 purposes, as shown on Exhibit 3, page -5142?

11 A I use the cash for the community
12 obligations and interests.

13 Q What -- what specific- -- what
14 specifically did you use this cash for that you
15 couldn't use and pay with a check or with a credit
16 card? Why cash?

17 A We have always functioned that way since
18 we started the business. Actually, before we start
19 Copilotco, he only give me cash sometimes, I give
20 him cash sometimes to pay for stuff, to travel. It
21 has always been that way.

22 Q So as I look back through the checks, I do
23 see some checks to you, but these are some of the
24 larger checks I've seen.

25 But you're saying you always pulled out

1 cash from Copilotco to operate, in these amounts of
2 3,000 and 2700? This is a regular amount?

3 A No. You ask me the average before and I
4 average between 3,000 and 5,000. So some months I
5 take a lot less, some months I take a little bit
6 more, and it average out between 3- to \$5,000 per
7 month.

8 Q Where would you put all this cash?

9 A Sometime I --

10 Q Would you do like your mother did and save
11 it around the house and put it in places?

12 A No, we don't.

13 Q No? Why? Why not do what you've been
14 taught to do by your family?

15 A 'Cause I need the cash. I don't take the
16 cash out to save it. I take the cash out to pay for
17 bills and expenses.

18 Q Can you account -- if I leave a blank in
19 the transcript, can you give an explanation of where
20 you think these monies went when she sends you the
21 transcript, as far as where the \$5,700 went; is that
22 fair?

23 A I would not be able to recall because a
24 lot of the time sometimes I'm gonna put it in my
25 checking account, sometimes I'm gonna give partial

1 of it to my mother to grocery shopping, sometime I'm
2 gonna give those -- half of cash out, maybe all of
3 it, to Tracy.

4 A lot of the time we drive to the bank
5 together, I go into the ATM, take the cash out and I
6 give him, "Here. Here's 500" and then -- it's not
7 consistent every single time, so I won't be able to
8 put it in this transcript for you.

9 Q How much cash, on an average month, did
10 you give your mom from the Copilotco account?

11 A I don't remember that because sometimes I
12 use cash out from my checking account, as well.
13 Sometime Tracy took cash out from his checking
14 account, as well, and it's mixing. So I don't
15 remember.

16 Q Do you remember my admonition earlier
17 about estimates? I need to know some sort of range.

18 Would on average, in a given month, you
19 give your mom cash of between 2- and \$500? Would it
20 be between 10,000 and 15,000 a month? I need some
21 sort of range of what an average month of cash would
22 be to your mother.

23 A Between 800 and 1200 a month.

24 Q Per month?

25 A Yeah.

1 Q And that's an average of cash taken from
2 Copilotco each month and given to your mother,
3 correct?

4 A Not each month from Copilotco account.
5 That is not correct.

6 Q Okay. How much is the average per month
7 of cash that you would give your mother from
8 Copilotco's account?

9 A I would say 800.

10 Q Okay. 800. And that would be true per
11 month in 2018, correct, until your separation?

12 A We always given my mother that money since
13 my mom moved in with us in 2010 and live with us.
14 It's for grocery shopping and have some
15 miscellaneous expense for Troy, yeah.

16 Q Okay. And if you had text messages, that
17 would be in there, too, with Tracy confirming that
18 agreement or that understanding, probably?

19 A Yeah. We sometimes communicate through
20 text or verbal, say, "Hey, I take money out for Mom.
21 Can you take cash out and give it to Mom?" He
22 personally give my mom cash many times.

23 (Exhibit 5 marked for identification.)

24 ///
25

1 BY MR. WEBB:

2 Q I'm gonna hand you what I've marked as
3 Exhibit 5. The Bates numbers are -5148 through
4 -5162. Now, these I don't need you to look at
5 before we go through them, but I just want you to
6 look at them one by one.

7 On the first page of Exhibit 5, for \$5500,
8 does that look to be a true and correct copy of your
9 signature?

10 A Yes.

11 Q Okay. And that's a withdrawal for cash of
12 5500 in 2016, correct?

13 A Yes.

14 Q And this lines up with about the amount
15 that you said you took out of the business, between
16 4- and \$6,000 a month?

17 A Yeah.

18 Q And on the next page, \$7,000 -- that's in
19 August of 2016 on page -5149 -- is that also your
20 signature there?

21 A Yes.

22 Q And on the next page, -5150, for \$1500 in
23 2016, that's also a true and correct copy of your
24 signature?

25 A Yes.

1 Q And on the next page this is another cash
2 withdrawal for \$2,000 -- in February of 2017 for
3 \$2,000 out of the Copilotco account. That's a true
4 and correct copy of your signature, right?

5 A Yes.

6 Q Next page, \$2500 in 2017, in May. That's
7 a true and correct copy of your signature when you
8 took cash out of Copilotco's account, correct?

9 A Yes.

10 Q If we were to keep on going through this,
11 can you take a look through the remainder of the
12 documents and confirm that they are all your
13 signatures and they look to be accurate. Take your
14 time.

15 A These are not my signature.

16 Q Which page are you on?

17 A This is -5158.

18 Q Okay. So -5158 -- everything until then
19 is your signature, but -5158 you're saying is not
20 because that's Tracy Reed's signature for a thousand
21 dollars, correct?

22 A Correct.

23 Q Okay. Keep on going. And so I'll just
24 ask you to put a tab on the one with Tracy Reed's
25 signature in the middle of the page.

1 MR. OTTILIE: It's No. -5158.

2 MR. WEBB: Thank you.

3 MR. OTTILIE: I mean, these are going with
4 me, so I'm not sure what the tab does.

5 MR. WEBB: I might need to refer back to
6 it.

7 MR. OTTILIE: You got it.

8 BY MR. WEBB:

9 Q Earlier, you mentioned that sometimes you
10 were a signatory and sometimes you weren't. Did you
11 understand that --

12 I understand that at one point you were no
13 longer signatory on the Copilotco U.S. Bank account,
14 but did you ever understand that you were removed
15 and then put back on at any time?

16 A Yes.

17 Q When were you put back onto the Copilotco
18 account after you had been removed?

19 A I was removed sometime the end of 2017.
20 Maybe early -- late 2017 or early 2018. I don't
21 know when.

22 Q What caused you to understand or to know
23 that you had been removed from the U.S. Bank
24 Copilotco account?

25 A That one day I go on and then I do all of

1 the normal routine, like make sure that the
2 transaction that we run from the credit cards went
3 through, and I can't log in anymore. I went to the
4 bank, and the bank teller told me that I was
5 removed.

6 Q And that was in approximately what month?

7 A Exact, I don't remember. Sometime late
8 2017.

9 Q And how long had you -- when you were
10 removed, that was removed, and so it caused you to
11 not be able to do what?

12 A Not be able to have any access to
13 Copilotco U.S. Bank account.

14 Q Could you still access online?

15 A No.

16 Q Was that -- you were removed as a debit --
17 your debit card wouldn't work anymore or you were
18 removed as a signatory?

19 A I don't know. That, I don't know.

20 Q So it might just be that the debit card
21 didn't work anymore or that debit card was removed?

22 A I was told by the bank teller that I was
23 removed.

24 Q Okay. And sometime thereafter, did you
25 get a new debit card or a new -- so you could access

1 the account?

2 A At some point Tracy and I both have new
3 credit card -- debit card because this expired. So
4 I don't recall if I got that new debit card,
5 because --

6 Q How many days, weeks or months after that
7 late 2017 day did you get a new debit card?

8 A Exact, I would not remember, but sometimes
9 in early 2018.

10 Q So within a couple weeks to a month or so
11 you got a new debit card and you had access again?

12 A I don't remember the timeline. I'm not
13 recalling at this time.

14 Q So it could have been a week later, it
15 could have been five or six weeks later? You don't
16 know?

17 A I don't know.

18 Q Okay. I'm gonna give you what's marked as
19 Exhibit 7A. Unfortunately, it's not Bates-numbered,
20 so I'm gonna write on the bottom of it with a "7" in
21 the middle of the page and a dash for each page.

22 (Exhibit 7A marked for identification.)

23 BY MR. WEBB:

24 Q The silver lining is that they are
25 numbered pages 1 through 5. So it's gonna be "7A-1"

1 through "7A-5."

2 MR. OTTILIE: Was there an Exhibit 6?

3 MR. WEBB: I'm skipping it.

4 MR. OTTILIE: Permanently or temporarily?

5 MR. WEBB: It will be a surprise,
6 depending on what your client says when we come
7 back.

8 (To the Witness) I'm gonna let you know
9 that "7A" is a document you received in response to
10 your request for bill particulars from my client.
11 And page 2 of "7B" -- and I'll give you that now, as
12 well -- has the exact same data but it's sorted
13 under the "Purpose" column alphabetically. So I'm
14 gonna give you "7B," pages 1 through 5.

15 (Exhibit 7B marked for identification.)

16 BY MR. WEBB:

17 Q Have you seen these before today's date?

18 A That bill in particular?

19 Q When it was produced by my client?

20 A Yes.

21 Q Do you have any comments as to what was
22 produced by my client shown in Exhibit 7A or 7B?

23 A This is "AA" and "7A" again. So there is
24 two "7As." There is no "B" for me.

25 Q Hang on. Handing you "7B," pages 1

1 through 5.

2 MR. OTTILIE: It's got 1 through 5?

3 THE WITNESS: Yes.

4 MR. WEBB: Yes.

5 BY MR. WEBB:

6 Q On "7B," pages 3 and 4, there is a page
7 and a half of overdraft paid fees. Do you know what
8 caused these to occur with the Copilotco account?

9 A No, I don't.

10 Q When you withdrew monies from the account,
11 did it sometime cause the account to become
12 overdrawn?

13 A I understand that if we don't have enough
14 money in the bank and we withdraw, it will cause
15 overdraft. But when I make the transaction to
16 withdraw, I was not aware it was gonna cause an
17 overdraft fee.

18 Q And that's because you didn't check the
19 balance before you made the withdrawal, correct?

20 A Correct.

21 Q Do you realize that you could have checked
22 the balance before you made a withdrawal?

23 A It never want to be on my mind because
24 when I make a withdrawal, if there was not enough
25 money in the account, I can't withdraw the money.

1 They're gonna tell me, "You don't have enough to
2 withdraw."

3 Q Is that actually what happened or would
4 they still give you the money but charge you a fee,
5 as well?

6 A That's what happened before.

7 Q And you didn't realize that was what was
8 happening?

9 A What happened was that when they -- when
10 we don't have enough money in Copilotco checking,
11 they're gonna tell me -- the bank teller tell me,
12 "Ma'am, you don't have enough to withdraw." And
13 that's how I will know how much money in Copilotco
14 bank account.

15 Q But sometimes then why would you get a
16 page and a half of overdraft fees? When would that
17 happen?

18 A I don't know why this causes what
19 happened.

20 Q When you first saw the overdraft fees on
21 the account -- 'cause you checked them once a
22 month -- what did you do about those overdraft fees?

23 A Nothing. I'm waiting for Tracy to tell me
24 what to do.

25 Q Did you get -- did you let him know that

1 you were -- you were the one in charge of the client
2 income and there was a concern about income?

3 A I believe right then I was telling Tracy
4 that we were way behind in paying bill and Copilotco
5 checking account was not in my top priorities back
6 then because our community obligations bills were
7 way behind for both of us.

8 Q And when was that?

9 A It was sometimes -- probably starting some
10 in 2018.

11 Q Okay. 'Cause these overdraft fees are all
12 the way back in the 2016, '17, '18, '19, and '20 --
13 well, there is actually only one in 2020.

14 So it looks like it's just in the first
15 month of 2019 when those checks were made payable to
16 you, and 2018 and '17. There look to be a couple in
17 2019, the month after you left, but then they end,
18 it looks like, other than a few -- about a year
19 later, there are two or three.

20 So you didn't do anything about the
21 overdraft fees and when you wrote checks to yourself
22 you didn't check to -- did you ever write checks to
23 yourself and deposit them in your Bank of America
24 account?

25 A Yeah.

1 Q When you wrote checks to yourself and
2 deposited them in the Bank of America account, did
3 they ever get rejected for not enough money from
4 Copilotco?

5 A Not that I recall. Not that I recall.

6 Q When they would still go through, was it
7 your understanding that there would be a fee to
8 Copilotco because of insufficient funds?

9 A No, I don't.

10 Q You didn't know?

11 A No.

12 Q Did you ever check to -- think to check on
13 the bank statement to see what was happening with
14 those checks you were writing?

15 When you wrote checks to yourself, how
16 much did you know to write to yourself if you didn't
17 check the account balance first?

18 A I usually write 600 to 800, just the same
19 amount that I -- with the check one, I feel like
20 Tracy and I agree that, you know, whenever I write
21 checks, he knows.

22 And I always tell him, you know, like,
23 "I'm writing a check to myself for 800 for the
24 grocery." And whenever I do it, I have been doing
25 it and there is no say and there is no protest or

1 anything from Tracy.

2 Q When you say whenever you write a check,
3 Tracy would know, would you always -- 'cause he's
4 not the one writing the check, you were the one
5 writing the check -- would you always text him and
6 get authorization?

7 A No, I don't. Because when we do tax
8 together, those money claims our profit.

9 Q So you're saying at the end of the year,
10 when you'd meet with your tax consultant to do your
11 tax together, then Tracy would know, correct?

12 A That, I'm not sure. Tracy has the access
13 to the U.S. Bank account, as well, and he check that
14 account and fund, as well. So I would think that
15 anything I associate with that account Tracy is
16 aware whenever he check it.

17 Q But if you're the one writing the check,
18 not Tracy, how would he know that you are writing a
19 check and depositing it?

20 A It's not from my handwriting check. I can
21 write my check. We do everything electronic so that
22 nothing behind the door, everything will show in the
23 bank statement. So you can issue a check -- just
24 log in to the account and issue a check
25 electronically. That's how we pay the other

1 employee, as well. And that's how we pay the other
2 employees, as well.

3 Q Sure. And so would you tell him before
4 you would issue an electronic payment to yourself
5 and ask him permission each time?

6 A No, I don't.

7 Q Why not?

8 A I have never had to.

9 Q Shouldn't you want to make sure that
10 there's -- let me ask you this: Were you aware of
11 all the expenses that Copilotco had?

12 A I am not aware all of the expenses of
13 Copilotco.

14 Q So then how did you know that there was
15 enough funds to pull out if you're not aware of the
16 expenses?

17 A 'Cause I always been able to pull out the
18 fund. If there is no sufficient fund, I won't be
19 able to do so.

20 Q Now, the overdraft items total about
21 \$2988, so about \$3,000 of overdraft fees. Do you
22 believe that you are responsible for a portion of
23 these?

24 A No.

25 Q Why not?

1 A I'm not aware of these.

2 Q So you never saw any overdraft fees on the
3 account statements when you logged in?

4 A Prior the time I was locked out of the
5 account, there are time, I told you before, we
6 were -- don't have enough fund in the U.S. Bank
7 account, Tracy or I personally put money in the
8 account to make it all positive again.

9 So since the date I was removed out of the
10 Copilotco U.S. Bank account, I have no idea what is
11 going on with that account.

12 Q So before you were removed, the 82 charges
13 on there for overdraft, do you -- you had access to
14 the account during that time and so you could see
15 those overdraft charges, correct?

16 A I don't recall at this time. If I'm
17 logged in, I don't scroll through and stalking the
18 account, every single transaction. I just go in
19 there and make sure that how much we -- we charge
20 the clients and if the transaction is completed.

21 Q Who is Audi Financial?

22 A Audi Financial is the mortgage -- the
23 finance company for the Audi, our car back then.

24 Q And that's your car, correct, or is it his
25 car?

1 A It's our car. We both own that.

2 Q Okay. And who is on the loan for the
3 Audi?

4 A Both of us.

5 Q Okay. And did you use that as a company
6 car or is that a personal car for you?

7 A It's a community car for Tracy and I.
8 It's a family car.

9 Q Who drove it -- what did you drive to
10 Costco to work?

11 A I drive Audi -- the Audi for work -- to
12 work.

13 Q Okay. So when you'd drive the Audi to
14 Costco, you drove that primarily or sometimes, or
15 what -- what was your primary driver to go to
16 Costco?

17 A That Audi.

18 Q What was your primary driver to take your
19 kid around?

20 A That's Audi. No, I take it back. It's
21 split half and half, Tracy car and my car. The
22 company car back then was the Land -- Land Rover, if
23 I remember correctly, and my car, 'cause his -- he
24 has a bigger car.

25 Q Okay. And so you said you do everything

1 through the computer, right, as far as sending
2 invoices via email, checking online. So why would
3 you need a company car?

4 A Tracy would answer that question. I don't
5 know.

6 Q Okay. So you didn't use it to do
7 marketing or to drive, to take things to customers
8 or to deliver anything for Copilotco? That's not
9 what you used the Audi for?

10 A No.

11 Q Okay. So you use it for your personal, to
12 take -- to get to your own job at Costco and to take
13 Troy, your son, around, right?

14 A And to travel with family and with Tracy.

15 Q And you didn't drive to the data center
16 regularly in the Audi, did you?

17 A No.

18 Q You didn't haul server equipment in the
19 Audi?

20 A We did at some point, maybe a couple
21 times.

22 Q A couple times during how many years?

23 A Probably a year. A year.

24 Q And what about the other years? Did you
25 haul around server equipment in the Audi other

1 years?

2 A No. We just bought it in 2017.

3 Q Okay. And so where -- you drove server
4 equipment around once or twice, you said, in the
5 Audi?

6 A Yeah.

7 Q Okay. And the payments for the Audi were
8 out of the company account?

9 A It is either from Tracy Bank of America
10 account, my Bank of America account or the U.S. Bank
11 Copilotco account, not always from one account.

12 Q Why was it ever deducted from the
13 Copilotco account?

14 A When we don't have enough money from my
15 checking account or from Tracy checking account, we
16 use U.S. Bank Copilotco account to pay for it.

17 Q Why would you deduct monies from -- for
18 Audi straight from the business account instead of
19 deducting it from your personal? Why wouldn't you
20 just move your personal -- some monies from
21 Copilotco to your personal and pay personal
22 expenses?

23 A We have always done it this way and I
24 don't know why. Tracy told me that anything that we
25 do with the business U.S. Bank account, we will

1 always claim as our profit as joint income and we
2 pay tax at the end of the year. It has always been
3 that way.

4 Q Did anyone ever tell you that you should
5 pay personal expenses out of your personal bank
6 account?

7 A No.

8 Q You don't remember being at a gym with
9 Mr. Hamby and Mr. Reed and them telling you that you
10 have to pay personal expenses out of a personal bank
11 account?

12 A No.

13 Q What is MB Financial?

14 A This is our mortgage company for our
15 house.

16 Q And that was for your personal home,
17 right?

18 A It's for Tracy and my home -- our home.

19 Q And did you set it up so MB Financial was
20 taking its payment from the company, Copilotco
21 account?

22 A I don't recall if I set it up or Tracy set
23 it up.

24 Q What about, on "7B" there is 26 line items
25 that are entitled "Customer Withdrawal," totaling

1 \$77,000.

2 MR. OTTILIE: What page?

3 THE WITNESS: "7B."

4 MR. OTTILIE: "7B," page what?

5 THE WITNESS: "7B," customer withdrawal
6 from here to here.

7 BY MR. WEBB:

8 Q Earlier you testified there was one
9 document on the customer withdrawals that was signed
10 by Mr. Reed. Other than that, though, these
11 customer withdrawals were all signed by you,
12 correct?

13 A I would not be able to match all of these
14 with the signature page. So if I say it's correct,
15 I'm --

16 Q I understand. But Exhibit 5, I think
17 we've already confirmed that all those were your
18 signature except for one for \$1500, correct?

19 A Yeah, correct.

20 Q So you would agree that any customer
21 withdrawals that you took out, all of Exhibit 5 --
22 and I'll represent to you that that was \$76,099 of
23 withdrawals --

24 MR. OTTILIE: On Exhibit 5?

25 MR. WEBB: Correct.

1 BY MR. WEBB:

2 Q Do you have any reason to dispute that it
3 was 76,000 on Exhibit 5 as customer withdrawals that
4 you took out of the Copilotco account?

5 A No.

6 Q What is Apple Online?

7 A I don't know if that some Applecare or
8 Apple stores or any Apple account.

9 Q It appears to be a new phone or iPad or
10 laptop. Do you know, in October 2018, if you
11 purchased one of those types of devices?

12 A I don't recall I purchase it or Tracy
13 purchase it. We purchase many of the devices
14 through the years.

15 Q Did you get a new device in October of
16 2018? It was with your debit card. I'll try to
17 help you out here.

18 A Which debit card?

19 Q Yours. The Copilotco account.

20 A I might have.

21 Q What device was it?

22 A I can't recall. I don't -- I have to look
23 it up. I don't -- I don't have the receipts to
24 know.

25 Q Sure. That device was purchased by

1 Copilotco company accounts. Can you agree that
2 within two weeks you'll return that device to the
3 company?

4 MR. OTTILIE: Well, let's not agree to
5 anything here. Is that a request?

6 MR. WEBB: Yes.

7 MR. OTTILIE: Okay.

8 BY MR. WEBB:

9 Q Do you understand my request?

10 A I do, but I --

11 MR. OTTILIE: Hang on. Hang on. That's
12 all he asked. What is this you --

13 BY MR. WEBB:

14 Q Can you explain to your attorney what
15 device this is.

16 A I don't know what device that was. I
17 don't remember -- I don't know what I bought it
18 with. I don't remember. I don't have the receipt
19 of it. I don't know what device that was purchased.

20 MR. OTTILIE: So this is -- we'll get some
21 help here from counsel.

22 What are we talking about? Which entry?

23 MR. WEBB: It's -- on "7B" it's the first
24 line item for \$1345.80.

25 MR. OTTILIE: First line item on "7B,"

1 page what?

2 THE WITNESS: Yeah, right here.

3 MR. OTTILIE: Apple Online. Who do you
4 want that returned to?

5 MR. WEBB: My office.

6 MR. OTTILIE: But to whom? Is it going to
7 you or --

8 MR. WEBB: To me. For my client, for the
9 Copilotco, care of me.

10 MR. OTTILIE: Do you represent Copilotco?

11 MR. WEBB: Yes.

12 BY MR. WEBB:

13 Q On "7B" there is an item dated February 12
14 called "DRUS Collection for \$1995." Do you know
15 what -- it's on page 2 of Exhibit 7B, about a third
16 of the way down. It's for \$1995.92. What is DRUS
17 Collection?

18 A It's our community debt settlement.

19 Q Let's look at the next page. There is IRS
20 and Franchise Board. There is charges for \$52,000.
21 And I'll just represent to you that there is line
22 items with the IRS and the Franchise Tax Board on
23 Exhibit 7B on pages 2 and 3.

24 Weren't some of these involving your
25 personal tax payments from -- that were paid by

1 Copilotco bank account?

2 MR. OTTILIE: When you say "personal" --

3 MR. WEBB: Individual, not corporate.

4 MR. OTTILIE: Her individual tax returns
5 or are they joint tax returns?

6 MR. WEBB: Either.

7 BY MR. WEBB:

8 Q Either yourself as an individual or
9 yourself as a married party, did you cause payments
10 to the Franchise Tax Board or the IRS, either one,
11 for any individual responsibilities or debts you had
12 from the Copilotco account?

13 A Tracy and I agree that we gonna use
14 U.S. Bank account to pay for our joint income tax.
15 This is all tax payment.

16 Q Why didn't you pay out of your personal
17 account with monies that had been distributed from
18 the company to your personal account?

19 A Because we don't have enough on either of
20 our checking account and Bank of America to make
21 payment.

22 Q But you did have enough funds in the
23 Copilotco account?

24 A Back then, yes.

25 Q And so why didn't you move those monies

1 from Copilotco's account and then cause a
2 distribution to your personal account to then pay
3 your tax obligations?

4 A I don't know. Tracy told me to do so.

5 Q There is also a section in Exhibit 7
6 entitled "ATM Withdrawal," and that's on page 7B
7 (sic), page 1, totaling \$6,980; 20 different line
8 items.

9 Do you believe that you caused a lot of
10 those ATM withdrawals to happen for approximately
11 \$6,980?

12 A Where are we at?

13 Q On page 1 of Exhibit 7B. There is 20
14 different line items.

15 A I don't have all the -- I withdraw ATM, as
16 well, but I don't recall every single transaction.

17 Q Do you have any reason to dispute that you
18 made approximately 20 deductions of ATM withdrawals
19 from the Copilotco account, as shown here on
20 Exhibit 7B? Do you have any reason to dispute that?

21 A No.

22 Q So it's probably accurate?

23 A I don't know if it's accurate. It's
24 probably some of these could be my withdrawal, but I
25 don't know if it's all of them would be my

1 withdrawal.

2 Q Do you have any reason to dispute or think
3 it's a different number than 20 ATM withdrawals that
4 used your ATM card to deduct cash from Copilotco's
5 account?

6 MR. OTTILIE: Do you know?

7 BY MR. WEBB:

8 Q No, that's not my question. Do you have
9 any reason to dispute that these 20 are from your
10 debit card?

11 A The only reason I might dispute -- do I
12 have any reason? I do.

13 Q What's your reason?

14 A Because I'm not the only person who
15 withdraw these ATM withdrawal. Tracy usually
16 withdraw the fund from U.S. Bank Copilotco account
17 through ATM, as well.

18 Q With his ATM card?

19 A Correct.

20 Q And you would do it with your ATM card?

21 A Yes.

22 Q Did you ever borrow his ATM card?

23 A No.

24 Q Did he ever borrow your ATM card?

25 A No.

1 Q So if it's your card, it was your
2 withdrawal of cash from the Copilotco account,
3 correct?

4 A Correct.

5 Q Okay. Thank you. And when you withdrew
6 those monies, you were using those funds, that cash
7 to pay your mom approximately \$800 a month, to buy
8 groceries, to buy clothes, those kind of expenses:
9 Gas, groceries, et cetera, correct?

10 A Not only that. I sometimes give the cash
11 to Tracy, as well, for his expenses.

12 Q Approximately how much cash would you give
13 on an average month to Tracy?

14 A I can't recall. It's a recall of ten
15 years of a lot of personal transactions.

16 Q Let's say when you were fighting in 2018,
17 how much, on average, in an average month, would you
18 give to Tracy in cash each month?

19 A In 2018 Tracy and I do not exchange cash
20 through ATM. Like, I don't withdraw cash and give
21 it to him in 2018.

22 Q Did you ever hand him cash in 2018 on a
23 regular basis?

24 A I don't recall. No, not on a regular
25 basis.

1 Q What about in 2017? Would you ever hand
2 Tracy cash on a regular basis -- cash in 2017?

3 A What do you mean, "regular basis"?

4 Q Every month.

5 A No.

6 Q Around 2016, would you give Tracy cash on
7 a regular basis in 2016?

8 A Not on a regular basis, no.

9 Q On what kind of basis would you give Tracy
10 cash in 2016?

11 A I can't recall. I take the money out and
12 we split it once for a while. I would say five
13 times a year, five months, yeah.

14 Q Okay. Okay. Thank you. Would you say
15 that someone else did more of the books at Copilotco
16 than you?

17 A No.

18 Q Would you say that you were -- did more of
19 the financial bookkeeping than anyone else at
20 Copilotco?

21 A No. I think the bookkeeping -- I don't
22 really know that I -- I am responsible to do the
23 bookkeeping. Most Tracy and I oversee the bank
24 statement of Copilotco and know the cash flows. So
25 for me, the destination bookkeeping, formally, I

1 don't have it.

2 Q Okay. And who other than you did more
3 than you with the finances at Copilotco?

4 MR. OTTILIE: Wait, wait.

5 MR. WEBB: Let's say in 2017.

6 MR. OTTILIE: Objection. Vague and
7 ambiguous as to -- what was the phrase? Financials?
8 BY MR. WEBB:

9 Q Who other than you -- and I'll allow your
10 counsel time to object -- who other than you did
11 more with the company finances in Copilotco during
12 2017?

13 A Tracy --

14 MR. OTTILIE: Same objection with respect
15 to the term financials, as to what that includes.

16 MR. WEBB: Sure.

17 THE WITNESS: For what I believe, finance
18 means that anything relating to cash flows of the
19 company, make sure that the money is in the U.S.
20 Bank checking account, make sure that we make money.
21 That's what I am -- in my mind that I believe what
22 finance is.

23 So to answer your question, in my belief,
24 in my knowledge of our finance, Tracy is the one who
25 did that, who would oversee the finance of the

1 company.

2 BY MR. WEBB:

3 Q And he did that more than you?

4 A Yes.

5 Q So earlier, at the beginning of the day
6 today, you testified about things that you were
7 responsible for, but what you meant was Tracy was
8 responsible for those and you actually assisted him,
9 right?

10 A Correct.

11 Q Okay. Do you remember what the last four
12 digits of your debit card were at any given time?

13 A No.

14 Q Do you still have that debit card for
15 Copilotco?

16 A No.

17 Q When is the last time you had a Copilotco
18 debit card?

19 A November 2018.

20 MR. OTTILIE: Did we get an answer to the
21 pending question?

22 Madam Court Reporter, did we get an answer
23 to the question?

24 THE REPORTER: Yes.

25

1 BY MR. WEBB:

2 Q You had a Target card that was linked to
3 the Copilotco account, correct?

4 A What did you mean, linked?

5 Q There was transactions that were charged
6 to Copilotco for Target cards, correct?

7 A That is correct.

8 Q And what did you buy at Target? Primarily
9 was it for your home or for Copilotco?

10 A Mostly I use the Target credit card to use
11 grocery and all of the community obligations for the
12 family, for Tracy and I and Troy. Mostly for Troy.
13 Food for Troy, clothing for Troy.

14 I also use the Target card to pay for our
15 tae kwon do class, for our family tae kwon do class,
16 all three of us, monthly.

17 Q Have you produced the Target card
18 statements for November/December of 2018 and
19 January 2019?

20 A I have not.

21 Q Why not?

22 A I don't have access to it anymore.

23 Q Did you call Target to ask for a copy of
24 those statements?

25 A I called them and they told me they only

1 can provide me one. 'Cause I asked for online the
2 virtual statement, and they told me what I have was
3 just back in January 2020. That's what they give
4 me. So I don't know how to get -- I don't know how
5 to get more of the statements from the year.

6 Q Did you contact them and ask them for
7 statements back in 2018 or '19?

8 A I did. I called them and I say, "Can
9 I" -- "how can I have the statement?"

10 And they told me, "Go online, 'cause you
11 asked for virtual access."

12 And I go virtual, and that's all I could
13 find, is back in January of '20, and I have not
14 called them back and I don't know how to retrieve
15 those documents.

16 Q Okay. I would encourage you to contact
17 them, because they do have bank statements back that
18 far. You just have to ask for them.

19 So I need to understand why these expenses
20 are here on the Copilotco account for Target because
21 they have a decent amount of payments that's on the
22 last page of "7B" and I don't have those, okay?
23 Especially if they were for expenses that aren't
24 properly linked to the company. Okay.

25 And those transactions, it looks like

1 there is four of them totaling around \$3200, \$3300
2 right after you separated from Tracy. That seems to
3 be true and accurate that that amount of money was
4 spent from Copilotco to pay off Target cards?

5 A I don't recall at this time. It's been a
6 long time.

7 Q That's a lot of Target cards in a very
8 short period of time, within four weeks. Why was
9 over \$3,000 spent at Target within four weeks?

10 A I would not believe that the money I spent
11 over the four weeks with Target. I don't recall at
12 this time.

13 Q And that was right after you separated
14 from Mr. Reed, correct?

15 A Yes. Only the one in -- yes, that's what
16 happened.

17 Q Who is MB Financial?

18 A MB Financial is our mortgage company for
19 our home.

20 Q Okay. And same question as earlier: Why
21 not pay that out of your personal account instead of
22 the Copilotco account?

23 A Because we don't have enough money to pay
24 out of our checking account.

25 Q Why didn't you transfer to your personal

1 checking to pay your personal finances?

2 A That's how we have always function. I
3 don't know why. I just do what Tracy ask me to.

4 Q Have you ever done a debt settlement of
5 your personal credit card debt?

6 A I've done a debt settlement for our
7 community debt back then.

8 Q When was -- when you say "back then," when
9 are you referring to?

10 A Sometimes in -- I can't recall exactly,
11 but it's prior our separation. I don't remember the
12 month exactly at this time.

13 Q Approximately how many months before your
14 separation?

15 A Approximately six months.

16 Q Do you remember making an agreement that
17 only Tracy Reed would be the manager of Copilotco
18 when you formed it?

19 A No.

20 Q Who did you believe was designated as
21 manager of Copilotco when you formed it?

22 MR. OTTILIE: Objection. Lack of
23 foundation.

24 BY MR. WEBB:

25 Q Go ahead.

1 A I would think my husband is the manager.

2 Q What leads you to believe that Tracy Reed
3 was manager of Copilotco?

4 A He ran everything. He set up the server.
5 He work with the clients. He deal with negotiation,
6 the price with the clients. He -- he tell me how
7 much to bill them. He created invoice.

8 Q Why do you believe in your mind that this
9 lawsuit was filed?

10 A I believe that it's filed out of the
11 anger, bitterness, resentment, hatred.

12 Q And what caused that, in your mind?

13 A Because --

14 MR. OTTILIE: Wait, wait, wait.

15 Objection. Calls for speculation.

16 BY MR. WEBB:

17 Q To the best of your understanding, what
18 caused that?

19 MR. OTTILIE: Same objection.

20 THE WITNESS: Am I answering that?

21 MR. OTTILIE: Yeah.

22 BY MR. WEBB:

23 Q Unless he tells you not to answer, yes.

24 A Because Tracy did not want to divorce.
25 But I did not comply with him in certain things in

1 our marriage and he file the divorce without telling
2 me that, "I am filing the divorce."

3 The day that I went to the court to file
4 for divorce, the clerk told me that he file the day
5 before, so -- and he did file for divorce once in
6 2018 and then dismissed it and then filed it again
7 in 2018 and at least six months apart.

8 Q Say the last part again, I'm sorry.

9 A He filed a divorce once before and
10 dismissed it. And he filed again. That's our final
11 divorce, 2018.

12 MR. OTTILIE: That's when he filed the
13 final divorce. That's not when it finalized.

14 THE WITNESS: Oh, yeah. It's not when it
15 finalized.

16 MR. OTTILIE: It's okay.

17 THE WITNESS: Yeah. He filed a second
18 time. And that's when our divorce finalized and go
19 to trial and end. And he many time told me that I
20 was a very not good person when I am not a good
21 mother when I divorce him, but he is actually the
22 one who divorce me.

23 BY MR. WEBB:

24 Q Do you understand -- when was the first
25 time you understood that personal monies should come

1 out of the personal account, not the business
2 account?

3 A I never treat Copilotco U.S. Bank account
4 as a business account. In my mind, since the Day
5 One we start the business and open that U.S. Bank
6 account, it is always our joint account and I treat
7 it just like the other Bank of America account I own
8 and Tracy owned and we always take the money out in
9 any account as our income and we file tax for it.
10 So I don't have that concept of the business account
11 or use for personal account for personal things.

12 Q What agreement in writing did you have
13 with Mr. Hamby to take out personal monies from the
14 Copilotco account?

15 A I don't have any handwriting agreements
16 with Mr. Hamby.

17 Q Do you have an oral agreement with
18 Mr. Hamby?

19 A No, I don't have any oral agreement with
20 Mr. Hamby.

21 Q Do you have a text from Mr. Hamby agreeing
22 for you to take monies out of the Copilotco account?

23 A I don't have a text from Mr. Hamby. I
24 don't recall.

25 Q Have you ever offered to give money back

1 to Mr. Hamby and his 33 percent interest that you
2 took from the business?

3 A Not at all. Since Day One I knew him
4 until today -- until the lawsuit, I have -- no
5 questions are asked about Copilotco U.S. Bank cash
6 flow or anything.

7 Q Did you ever tell Mr. Hamby that you were
8 taking money out of the company bank account to use
9 for personal expenses?

10 A No.

11 Q Did Mr. Hamby have access to the -- to the
12 business bank account, online access where you saw
13 him access it?

14 A No.

15 Q Did you ever give him the bank statements
16 and tell him you were taking money out personally?

17 MR. OTTILIE: Objection. Compound.

18 THE WITNESS: I don't hand-give Mr. Hamby
19 the bank statements, no.

20 MR. OTTILIE: Pardon?

21 THE WITNESS: Hand him, personal hand him
22 the bank statement? No.

23 BY MR. WEBB:

24 Q Did you ever give Mr. Hamby cash, part of
25 the cash you took out of U.S. Bank on a regular

1 basis?

2 A No.

3 Q Did you ever give Mr. Hamby anything above
4 \$5,000 a year from the monies that you took out of
5 the Copilotco account?

6 A No.

7 Q Did you ever give Mr. Hamby anything of
8 value in comparison to the monies that you took out
9 to run your household?

10 A No.

11 Q Did you ever -- if I was to total this up,
12 the complaint lists about \$180,000 that was taken
13 out of the U.S. Bank Copilotco account for you and
14 you say Mr. Reed's purposes, correct? You
15 understand that's the allegation?

16 A It is for our community obligations and
17 expenses.

18 Q Was Mr. Hamby a part of that community?

19 A No.

20 Q Did Mr. Hamby benefit in any way from that
21 \$180,000?

22 A No.

23 Q Did you understand that Mr. Hamby was
24 contributing and helping with Copilotco?

25 A Can you rephrase that question, please?

1 Q Do you understand that Mr. Hamby had a
2 role to assist with Copilotco?

3 A No.

4 Q Why did you think he was a 33 percent
5 owner? Let me phrase that in a better way:

6 What do you believe Mr. Hamby was doing in
7 exchange for his ownership of 33 percent of the
8 company?

9 A What I am aware of, Tracy told me that
10 Mr. Hamby is not interested in any profit of
11 Copilotco until we sell the company. So my
12 understanding from Day One is that Mr. Hamby will
13 entitle 33 percent of what we sell the company.

14 Q So your understanding was that Mr. Hamby
15 was entitled to 33 percent of the proceeds of the
16 company, correct?

17 A What does "proceeds" mean?

18 Q What you just described: When the company
19 is sold, that Mr. Hamby would be entitled to
20 one-third of it, correct?

21 A The value of the business when we sell it,
22 yes.

23 Q And specifically it's 33 percent, not
24 really one-third, right, that Mr. Hamby is entitled
25 to?

1 MR. OTTILIE: Well, objection. Calls for
2 speculation, misstates testimony.

3 BY MR. WEBB:

4 Q Correct?

5 A For what I -- what Tracy told me, yes.

6 Q Do you have any reason to disagree that
7 Mr. Hamby did a lot of server work involving many,
8 many hours of work for Copilotco?

9 A Yes.

10 Q What reason do you have to disagree with
11 that statement?

12 A I don't see him working.

13 Q Do you believe that people can work
14 remotely?

15 A Yes.

16 Q And you said you don't see him working.
17 Were you regularly at Copilotco's location?

18 A Means at our home office?

19 Q Yes.

20 A Yes. I'm at home all the time.

21 Q Were you regularly at Mr. Hamby's home
22 office?

23 A Say it one more time, sir.

24 Q Were you regularly at Mr. Hamby's home
25 office?

1 A I have never known or seen his home.

2 Q Okay. So how would you know if Mr. Hamby
3 is working from home while Mr. Reed is working from
4 home?

5 A I don't know anything about Mr. Rod
6 Hamby's work from home.

7 Q Did you ever go to the data center to see
8 if Mr. Hamby was working there?

9 A No.

10 MR. OTTILIE: You never went or you never
11 went to see if he was working?

12 THE WITNESS: I never went to see him
13 working there.

14 BY MR. WEBB:

15 Q Did you ever -- how many times do you
16 believe you went to the data center?

17 A On average?

18 Q Yes.

19 A Through the entire -- since --

20 Q Per year, on average.

21 A Twice a year.

22 Q And in that twice a year, on average, that
23 you went to the data center, did you ever see
24 Mr. Hamby working there?

25 A I've never seen him working there when I

1 was in the data center.

2 Q Did you ever see him at the gym?

3 A Yes.

4 Q How often would you see Mr. Hamby at the
5 gym?

6 A Through all average the years since --
7 since I know him or what year?

8 Q Sure. 2017.

9 A 2017? None.

10 Q 2018?

11 A None.

12 Q 2019?

13 A None.

14 Q 2016, Mr. Hamby at the gym?

15 A I don't recall at this time.

16 Q And so it's possible you saw Mr. Hamby at
17 the gym in 2016?

18 A Yes.

19 Q And in 2015, you saw Mr. Hamby at the gym?

20 A Probably, yes.

21 Q Playing racquetball?

22 A Yes.

23 Q And that would be in 2015 and '16,
24 probably?

25 A Yes.

1 Q And you'd have discussions before and
2 after racquetball games with you, Mr. Hamby, and
3 Mr. Reed?

4 A I don't play racquetball, but Mr. Rod
5 Hamby.

6 Q But you were there when they were playing
7 racquetball?

8 A I was there at the gym, yes, while they
9 were playing.

10 Q And you'd have sometimes discussions
11 before or after racquetball games?

12 A No, I don't.

13 Q You never talked to Mr. Hamby?

14 A I talked to Mr. Hamby, but I don't -- I
15 don't understand what you mean, discussion. I say,
16 "Hi, how are you doing." Yes, I do.

17 Q And that would be true in 2016, '15, '14?

18 A Yes.

19 Q How often -- how many times a month would
20 you go to the gym and see Mr. Hamby during those
21 years, on average?

22 A I don't go to the gym to see Mr. Rod
23 Hamby.

24 Q How many times per month, on average,
25 would you see Mr. Hamby at the gym in 2015?

1 A Once a month or maybe even less than that.
2 So I would say a few times a year.

3 Q Were you aware that Mr. Hamby bought
4 servers for Copilotco?

5 A I was not aware.

6 Q Were you aware that Mr. Hamby bought
7 hardware for Copilotco?

8 A When you said that, if I was aware, it
9 means that the information was told -- I was told by
10 Tracy, so --

11 Q Or otherwise made aware. Any -- in any
12 way, shape or form did you know Mr. Hamby at any
13 point --

14 A No.

15 Q -- contributed hardware or supplies to
16 Copilotco?

17 A So Tracy told me Mr. Rod Hamby contribute
18 a server to Copilotco.

19 Q When did Mr. Reed tell you that?

20 A In 2010.

21 Q Okay. Do you have any reason to dispute
22 that?

23 A No.

24 Q Do you believe that Mr. Hamby contributed
25 anything else other than a server in 2010 to

1 Copilotco?

2 A I don't know the answer to that question.

3 Q Did you ever show or indicate to Mr. Reed
4 the amount or frequency of the cash you would
5 deposit into your personal Bank of America account?

6 A I don't.

7 Q I'm sorry?

8 A I don't. Can you ask that question one
9 more time, please?

10 Q Did you ever give or show Mr. Reed all the
11 cash you were depositing in your Bank of America
12 account?

13 MR. OTTILIE: You mean Mr. Reed or
14 Mr. Hamby?

15 MR. WEBB: Mr. Reed.

16 THE WITNESS: Have I ever showed Tracy?
17 Yes.

18 BY MR. WEBB:

19 Q Did you ever show Mr. Hamby cash that you
20 were depositing into your account and you were
21 taking out of the Copilotco account?

22 A No.

23 Q Did you ever tell him --

24 A No.

25 Q -- Mr. Hamby?

1 A No.

2 Q How much cash did you have on hand when
3 you separated from Mr. Reed?

4 A I don't recall at this time.

5 Q Approximately, please.

6 A A few hundred.

7 Q That's it?

8 A Yes.

9 Q How much cash had you given your mother at
10 the time of separation for her to hold for you?

11 MR. OTTILIE: I think that might be
12 compound and somewhat vague. I don't have any
13 problem with her answering that but --

14 BY MR. WEBB:

15 Q Go ahead.

16 A Two hundred, a hundred. Just for her gas.

17 Q How much -- how much in cash has your mom
18 returned to you or given to you --

19 Let me clean that up. How much in cash
20 has your mom distributed to you in any way since the
21 date of separation to now?

22 A I don't remember. I don't recall.

23 Q I need an approximate.

24 A I would say a few thousand, less than
25 5,000. Since like -- since separation until today?

1 Q Yes.

2 A I would say 10,000.

3 Q 10,000?

4 A Yeah.

5 Q And she gets -- does she have a regular
6 job where she has income from?

7 A No.

8 Q So that 10,000 she got to pay you back or
9 to give you money, do you believe those are monies
10 that came from Copilotco proceeds that you gave her?

11 A No.

12 Q Where do you believe she got that \$10,000?

13 A She travel back to Vietnam and take it out
14 of my stepfather, who passed away already, account,
15 and bring it back and help me out.

16 Q What's the status of the home that you
17 lived in with Mr. Reed?

18 A The status? What do you mean? What do
19 you mean, "the status"?

20 Q You know more about this than me. What
21 happened with that home?

22 MR. OTTILIE: She just doesn't understand
23 some of the words.

24 THE WITNESS: Since the divorce?

25 MR. WEBB: Yes.

1 THE WITNESS: In the divorce our community
2 asset, the home was divided as Tracy bought me out
3 of that home.

4 MR. WEBB: Why don't we take a lunch
5 break. It's noon. It's 12:00 O'clock.

6 Madam Court Reporter, is that okay with
7 you?

8 THE REPORTER: Yes.

9 MR. WEBB: Let's go off the record.
10 Counsel, is that agreeable?

11 MR. OTTILIE: Yeah, that's fine. Yeah,
12 sure.

13 THE VIDEOGRAPHER: We're going off the
14 record. The time is 12:10 p.m.

15 (At 12:10 p.m., the luncheon recess was
16 taken until 1:04 p.m.)

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1 San Diego, California, Friday, February 4, 2022

2 1:04 p.m.

3 * * *

4 AFTERNOON SESSION

5 THE VIDEOGRAPHER: We are going back on
6 the record. The time is 1:04 p.m.

7

8 EXAMINATION (RESUMED)

9 BY MR. WEBB:

10 Q You understand you're still under oath?

11 A Yes.

12 Q Is there any testimony that you said today
13 that after meeting with your counsel for lunch you
14 want to change?

15 A No.

16 Q Anything you want to add after meeting
17 with your counsel?

18 A No.

19 Q Okay. I have a lot of papers I want to go
20 through. The problem is, I need the text messages
21 between yourself and Mr. Reed to hang the
22 conversations from and to go back and correlate the
23 dates.

24 So what I'm gonna do is -- and your
25 counsel is not gonna agree with this, probably --

1 but I'm gonna suspend the deposition --

2 MR. OTTILIE: Oh, no, not again.

3 MR. WEBB: -- and wait for that production
4 of those text messages that you have on your phone
5 you confirmed today -- and I appreciate you have
6 those -- and produce those so we can finish the
7 deposition with all the documents here, 'cause I
8 can't finish without those. I understand they went
9 back to --

10 MR. OTTILIE: Somewhere in '19.

11 MR. WEBB: August 24 of 2018.

12 MR. OTTILIE: '18? Okay. Yeah, we talked
13 about getting those. So we're happy to do that,
14 actually.

15 MR. WEBB: So I'm gonna resume this after
16 we have those. We can work out some dates with your
17 counsel. That way, we can ask -- there are
18 questions that are informed with the document
19 production and the documents that are all together.
20 So we'll just do this once instead of twice.

21 MR. OTTILIE: We got time. I'm fine. I
22 could care less.

23 THE WITNESS: I am very -- have a little
24 window of vacation times left and right now I am
25 expect to take care of my son in the next two months

1 on my own. So it's gonna be really difficult for me
2 to ask for a day off and change my schedule.

3 MR. WEBB: Let's go off the record.

4 (Discussion off record.)

5 MR. WEBB: Yeah, can we go back on and do
6 a stipulation, sorry.

7 I propose to relieve the court reporter of
8 her statutory duty to maintain custody of the
9 transcript and to allow the transcript to be mailed
10 to my office for safekeeping.

11 I assume that the deponent is going to
12 visit her attorney's office to review the transcript
13 copy that he's ordering, I'm assuming. And if there
14 is any changes to be made, he'll send that to me by
15 both email and fax just to make sure I get that
16 errata sheet signed under penalty of perjury
17 within --

18 Would 20 days be sufficient from the time
19 you receive the transcript?

20 MR. OTTILIE: So you want her to review a
21 partial transcript and do that much?

22 MR. WEBB: Yeah, because I don't know when
23 we're gonna be back in session.

24 MR. OTTILIE: Yeah. Twenty-five days.

25 MR. WEBB: Twenty-five days from receipt

1 of the transcript?

2 MR. OTTILIE: Sure.

3 MR. WEBB: That way, you'll have enough
4 time to review and get it back.

5 MR. OTTILIE: It's not that difficult.

6 MR. WEBB: Thank so much.

7 And now we'll really go off the record. I
8 appreciate that.

9 (TIME NOTED: 1:09 P.M.)

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4 I, TRANG Q. REED, do hereby declare under
5 penalty of perjury that I have read the foregoing
6 transcript; that I have made any corrections as
7 appear noted in ink, initialed by me, or attached
8 hereto; that my testimony as contained herein is
9 true and correct.

10 EXECUTED this _____ day of _____,
11 20_____, at _____, _____.
12 (City) (State)

13
14 _____
15 TRANG Q. REED
16 Volume I
17
18
19
20
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25


1
2 I, the undersigned, a Certified Shorthand
3 Reporter of the State of California, do hereby
4 certify:

5 That the foregoing proceedings were
6 reported by me at the time and place herein set
7 forth; that any witnesses in the foregoing
8 proceedings, prior to testifying, were placed under
9 oath; that a verbatim record of the proceedings was
10 made by me using machine shorthand which was
11 thereafter transcribed under my direction; further,
12 that the foregoing is an accurate transcription
13 thereof.

14 I further certify I am neither financially
15 interested in the action nor a relative or employee
16 of any attorney of any of the parties.

17 IN WITNESS WHEREOF, I have this date
18 subscribed my name.

19
20 Dated: February 22, 2022.

21
22
23 
24 CATHERINE A-M GAUTEREAUX
25 CSR NO. 3122

Exhibits	\$77,000 116:1	1099 74:22	2010 7:22 15:24	85:18,25 90:15,24
Ex AA Trang Reed 022322 4:11 12:20,22 13:10,14	\$800 86:2,11,21 87:13 123:7	1099ed 74:21	16:5,10 18:13,14, 15,16,24 19:4,15, 22 20:11 21:2,8 22:5,6,10,17 23:5, 23 25:10 27:24 46:22 58:22 65:3 66:20 98:13 141:20,25	94:11,14,19,21 98:11 101:20 103:9 107:10,16 117:10,16 123:16, 19,21,22 126:19 127:18 128:7 132:6,7,11 139:10
\$	\$90,000 58:4	10:31 80:4		
	-	10:40 80:7		
	-35042 84:5	12 4:11 9:6 119:13	1200 97:23	2019 42:18 72:2,3 79:6 84:24,25 85:20,21 86:12, 16,21 87:14 89:4, 8,16 107:15,17 127:19 139:12
\$10,000 62:19 144:12	-35049 84:6	12:00 145:5	2011 27:24 29:23 32:24 33:1,7,11, 18,21,25 34:3,9 35:4 47:2,3 62:21 64:20	2020 15:8 35:4 94:3,4 107:13 128:3
\$100,000 76:23	-41 82:13	12:10 145:14,15	2012 29:18,19 47:6,12 76:1,17	2022 6:1,8 146:1
\$1345.80 118:24	-49 82:12	13 47:6,12 76:17	2013 76:7,8	2025.60 6:10
\$1500 99:22 116:18	-5001 78:10,25 82:12	14 140:17	2014 36:6,9,15, 20,23 38:15 39:6 44:6	23 15:7
\$180,000 135:12, 21	-5041 82:12	15 9:5,7 75:13,14 140:17	2015 8:14 35:20, 22 38:10,13 48:1, 3 139:19,23 140:25	24 42:20
\$1995 119:14	-5042 84:9,17	15,000 97:20	2016 37:19 38:7,9 45:16,18 55:7 75:15 76:17 79:4, 5 82:16,17,18 99:12,19,23 107:12 124:6,7,10 139:14,17 140:17	26 37:12 115:24
\$1995.92 119:16	-5045 86:1	16 75:12 83:23 139:23	2017 37:8 38:9 48:2,3,16,17,23 49:4,8,11,22 52:23 53:2,9 56:8 65:25 66:1,2 75:12 80:22 81:12,15,20 82:1, 9 83:23 100:2,6 101:19,20 102:8 103:7 114:2 124:1,2 125:5,12 139:8,9	2700 94:11 96:2
\$2,000 100:2,3	-5049 78:10,25 84:9,18	17 45:16,18 76:18 83:16,19 107:12, 16	2018 37:13,16,19 42:20 43:1,3 46:22 53:19 55:5 56:9 58:22 62:21 65:3 70:13,16,17 71:6,10,14,23 72:24 81:22 83:19	3 4:16 83:12,13,21 94:15,16 95:10 105:6 119:23
\$220 89:5	-5050 83:14,22	18 75:12 107:12		3,000 94:11 96:2, 4
\$2500 100:6	-5142 94:15,16 95:10	19 85:7 107:12 128:7		3- 96:6
\$2700 95:4	-5147 83:14,22	1984 7:10		30,000 58:15
\$2988 110:21	-5148 84:6,11,12 99:3	1:04 145:16 146:2,6		300 89:6
\$3,000 90:15 95:3 110:21 129:9	-5149 84:11,12 99:19	2		320 3:13
\$30,000 60:8,24	-5150 99:22	2 4:14 78:10,24 79:8 82:11 104:11 119:15,23		33 66:14,16,22,24 67:3,6,10,11,18, 21 134:1 136:4,7, 13,15,23
\$3200 129:1	-5158 100:17,18, 19 101:1	2,000 37:1 38:14		34 67:11
\$3300 129:1	-5162 99:4	2- 37:14,20 38:6 97:19		4
\$5,000 63:16,18 76:23 94:10 96:6 135:4	1	2-to-4,000 38:4		4 4:19 6:1 84:5,13, 16,18,19,21 86:1, 12 105:6 146:1
\$5,700 96:21	1 14:4 103:25 104:14,25 105:2 121:7,13	20 9:7 107:12 121:7,13,18 122:3,9 128:13		
\$500 62:12 89:5 97:19	10,000 62:14 97:20 144:2,3,8	20- 58:15 60:8,24		
\$52,000 119:20	102 3:5	200 90:15		
\$5500 99:7	103 5:4	2007 74:4		
\$6,000 99:16	104 5:7	2009 16:7,12,17		
\$6,980 121:7,11				
\$7,000 99:18				
\$76,099 116:22				

4,000 37:1,14,20 38:6		AA 4:11 12:20,22, 24 13:10,14 104:23	14,17 91:5 95:5,6 96:18,25 97:10, 12,14 98:4,8 100:3,8 101:13, 18,24 102:13 103:1 105:8,10, 11,25 106:14,21 107:5,24 108:2,17 109:13,14,15,24 111:3,5,7,8,10,11, 14,18 114:8,10, 11,13,15,16,18,25 115:6,11,21 117:4,8,19 120:1, 12,14,17,18,20,23 121:1,2,19 122:5, 16 123:2 125:20 127:3 128:20 129:21,22,24 133:1,2,3,4,6,7,9, 10,11,14,22 134:8,12 135:5,13 142:5,12,20,21 144:14	26:19
4- 99:16	7	ability 48:5 54:3	admonition 97:16	
4395 6:6	7 4:5 103:20 121:5	access 15:7,14 25:1 28:6,8,13 32:3 38:2 46:4 49:8 51:25 55:2 69:16 70:22,24 71:25 72:4,5,6,7, 12,17,19 79:14 82:20,24 84:2,24 85:3,9,14,18,21, 22 86:17,18,23 89:13,15,25 90:4 102:12,14,25 103:11 109:12 111:13 127:22 128:11 134:11,12, 13	advertising 17:16	
444 3:13	700 90:15		advised 8:4	
466 3:5	70th 6:6		affects 17:25	
49 79:10	76,000 117:3		AFTERNOON 146:4	
4th 6:8	79 4:14		agree 21:23 22:1, 2 32:20 35:25 36:13 52:14 67:20,22 70:4 77:23 78:8 108:20 116:20 118:1,4 120:13 146:25	
5	7A 5:4 103:19,22 104:9,22,23	account 24:20, 22,23 25:2,15,20, 25 27:11,22 28:6, 8,14,15,18,21 31:2,5,6,9,12,13, 16,17,18,19,22,23 32:1,4,9,10,11,12, 19,21 33:1,3,7,10, 16,20,25 34:5,8, 10,13 35:3,6 37:2, 15,23,24 38:1,22 39:1,7,17 40:22 43:9 46:5 49:9,12, 16,23 50:3,11,19, 21 51:4,8,20,23 52:5,9 53:21 54:7, 8,14,25 55:3,7,10, 14 58:8,9,14,19, 24 59:4,8 60:1,11, 15,16,20 61:8,12, 24,25 62:8,20,24 63:6,24 69:17 70:6,7,9,15,21,23, 25 71:17,19,24 72:1,3,4,10,20 73:2,5,7,11,18 74:1,2,3,6,16,20 77:9,11 82:3,4,6, 15,20,21,22,23 83:2,3,4,5,6,9 85:2,10,13,14,18, 23 86:11,17,19,23 87:14,23 89:16, 21,23 90:1,4,10,	agreeable 78:7 145:10	
5 4:21 84:12,14 98:23 99:3,7 103:25 104:14 105:1,2 116:16, 21,24 117:3	7A-1 5:5 103:25		agreed 39:12	
5,000 62:13 63:19 96:4 143:25	7A-5 5:5 104:1		agreeing 133:21	
5- 62:19	7as 104:24		agreement 24:4 39:5 64:4,5,6 98:18 130:16 133:12,17,19	
500 97:6	7B 5:7 104:11,14, 15,22,25 105:6 115:24 116:3,4,5 118:23,25 119:13, 15,23 121:6,13,20 128:22		agreements 133:15	
5001 4:14,22	7B-1 5:7		ahead 48:11 68:11 130:25 143:15	
5041 4:14,22	7B-5 5:7		air 80:17	
5042 4:19	8		AIS 44:21,22 45:4,10,12,18,19 46:4,7 47:3,20 48:17,24	
5049 4:19	8 32:6,9 94:3		AIS's 48:4	
5050 4:17	800 97:23 98:9,10 108:18,23		allegation 135:15	
5147 4:17	82 111:12		alphabetically 104:13	
5500 99:12	83 4:16		ambiguous 68:21 125:7	
559.431.4888 3:7	84 4:19		amended 4:11 13:1	
5th 7:10	8:53 6:2,9		America 31:5,7, 11,23 32:10	
6	9			
6 4:24 31:19 32:10 104:2	9 94:4			
6-something 31:17	92101 3:14			
600 108:18	93711 3:6			
619.231.4841 3:15	98 4:21			
67 67:8	A			
	a.m. 6:2,9 80:4,7			

33:22,23 35:18 44:23 54:22 58:8, 9,18,24 73:2 74:2, 3,6 107:23 108:2 114:9,10 120:20 133:7 142:5,11 American 44:23 amount 38:6 44:11,17 53:18 58:17,23 63:1 82:8 92:1 96:2 99:14 108:19 128:21 129:3 142:4 amounts 96:1 Android 40:19 anger 131:11 answering 131:20 143:13 anticipate 12:3,4 anymore 72:1,15 102:3,17,21 127:22 APC 3:3 apologize 84:15 app 43:19 APPEARANCES 3:1 appeared 84:14 appears 117:9 Apple 40:18,20, 21,22 43:10 117:6,8 119:3 Apple's 43:11 Appicare 117:7 approximate 76:22 143:23 approximately 19:14,23,24 42:25 46:21 47:15,17 58:13 59:6,11 60:8 62:13,25 66:19 90:7 102:6 121:10,18 123:7, 12 130:13,15	143:5 April 7:10 83:16, 18 area 45:2 argue 81:1,3 assert 75:18 77:2 assessment 21:23 asset 145:2 assist 136:2 assisted 126:8 associate 109:15 ATM 36:11 61:22 97:5 121:6,10,15, 18 122:3,4,15,17, 18,20,22,24 123:20 attach 23:3 77:21,25 78:17 attached 4:15,17, 20,22 5:5,8 attempts 20:23, 25 21:1 attorney 7:25 8:1 10:25 11:6,9 13:12 42:3 118:14 attorney's 11:15 Audi 111:21,22, 23 112:3,11,13, 17,20 113:9,16, 19,25 114:5,7,18 audible 80:15 August 42:20 99:19 authorization 90:21 109:6 authorize 87:1 authorized 86:25 90:19 Avenue 3:5 average 19:23 25:12,13 30:2 36:18,23 37:1,15,	17 38:10 49:19,25 50:1 90:12 96:3,4, 6 97:9,18,21 98:1, 6 123:13,17 138:17,20,22 139:6 140:21,24 aware 23:24,25 52:21 54:6 61:3 69:24 85:24 86:3 105:16 109:16 110:10,12,15 111:1 136:9 141:3,5,6,8,11 <hr/> B <hr/> back 8:14 14:15 15:11 20:13 21:2 22:5,24 35:9 39:25 40:22 41:6 42:7,17 43:1,13 59:17 62:2,4,5 73:13,15 76:1,4, 12,14,17 80:6 95:7,22 101:5,15, 17 104:7 107:5,12 111:23 112:20,22 120:24 128:3,7, 13,14,17 130:7,8 133:25 144:8,13, 15 146:5,22 backed 40:24 backup 43:9 balance 25:2,6 26:9 46:10,14,16, 23 47:7,17 49:23 50:5,7,9 105:19, 22 108:17 bandwidth 46:2 bank 4:14,16,19, 21 15:5 24:20,22, 23 25:1,15,20 27:10,11,19,20,22 28:6,8,10,13,15, 18,21 31:2,4,7,8, 11,23 32:10 33:1, 3,7,10,16,22,23 34:9,13 35:3,5,18 37:2,24 39:1 49:8, 12,15,23 50:6,10, 15 54:5,22,25	55:3,7 58:8,9,14, 18,24 59:4,7,25 60:15,16,19 61:23 69:17 70:6,7,8,15, 21,25 71:17 72:8 73:1,11 74:2,3,6 77:21 79:6,13 82:6,15,20,21,22, 23 83:2,3,4,5,6,8, 9,23 85:13,14,23 87:2,22 90:4,9 95:6 97:4 101:13, 23 102:4,13,22 105:14 106:11,14 107:23 108:2,13 109:13,23 111:6, 10 114:9,10,16,25 115:5,10 120:1, 14,20 122:16 124:23 125:20 128:17 133:3,5,7 134:5,8,12,15,19, 22,25 135:13 142:5,11 basis 9:3 25:6 36:18,20 123:23, 25 124:2,3,7,8,9 135:1 batch 84:17 Bates 77:24 78:22 82:11 83:14,22 84:5 94:15,16 99:3 Bates-numbered 78:10 103:19 began 63:14 beginning 17:22 27:24 39:8 63:21 64:8 69:21 126:5 belief 85:20 91:8 125:23 believed 49:5 belonged 93:8 benefit 135:20 big 9:4,9 45:12,19 bigger 21:21 112:24 bill 5:4,7 20:5,8, 16 23:1 29:21,22	45:10,13 48:5,9, 20,21 51:13 75:8 76:17,23 77:4 88:4,14,21 104:10,18 107:4 131:7 billing 47:22 bills 24:9,16 29:6, 12,24 30:4,5,6,8, 12,13,18,19,22,24 31:3 49:6 63:9 81:9,10,15 87:20 88:6,8,11 91:7,10, 12 96:17 107:6 birth 7:9,10 92:18 birthday 32:16, 17 bit 35:2 80:19 96:5 bitterness 131:11 blank 96:18 Board 119:20,22 120:10 book 61:20 book- 26:6 bookkeeper 26:6 bookkeeping 54:1 124:19,21, 23,25 booklet 10:21 books 124:15 borrow 122:22, 24 bottom 103:20 bought 40:11 114:2 118:17 141:3,6 145:2 break 79:23 80:9 145:5 briefly 11:24 bring 26:21,23 40:14,16 53:7 63:13 144:15
---	---	---	---	--

brother 61:3 brother's 92:20 budget 26:16 build 92:24 building 45:1 bulk 23:21 business 7:16 14:2 16:19 17:4 18:13,17,20 21:22 22:7,12 30:20,21 32:12 33:10 34:16,19,21 35:16,24 36:4,11 37:15,22,25 38:1, 21 39:3,7,17,21 50:19,20 54:9 55:10,14 61:8,12 62:7 64:10 74:20 75:6 77:4,9,10,14 79:13 82:3 90:20, 25 91:1,3,7,10,23 92:23 95:4,9,18 99:15 114:18,25 133:1,4,5,10 134:2,12 136:21 busy 29:15,19 buy 40:9,10,13,21 123:7,8 127:8 <hr/> C <hr/> California 3:6,14 6:1,7,9 15:20 146:1 call 10:18 31:19 32:9 127:23 called 21:5,6 43:17 44:22 119:14 127:25 128:8,14 Calls 68:8 131:15 137:1 car 111:23,24,25 112:1,6,7,8,21,22, 23,24 113:3 card 15:4 25:18, 23 28:10 34:24 35:2,5,15 54:5	57:18 72:14 95:16 102:17,20,21,25 103:3,4,7,11 117:16,18 122:4, 10,18,20,22,24 123:1 126:12,14, 18 127:2,10,14,17 130:5 cards 24:9,16,18 43:24 50:16,20 57:7 102:2 127:6 129:4,7 care 30:23 88:16, 25 89:1 119:9 cash 34:12,16,18, 23 35:3,7,8,16 36:11,17 37:3,4, 14,23 38:2,5,12, 21 39:6,20 50:1,2, 5,6,14,15,24 51:5 52:6,10 53:23 57:7,8 59:23,24 60:2,5,6,14,15,17, 19 61:8,11,15,22 62:6,19 63:3,16, 18,19 82:8 88:15 89:10,12 90:22 95:4,9,11,14,16, 19,20 96:1,8,15, 16 97:2,5,9,12,13, 19,21 98:1,7,21, 22 99:11 100:1,8 122:4 123:2,6,10, 12,18,19,20,22 124:2,6,10,24 125:18 134:5,24, 25 142:4,11,19 143:2,9,17,19 categories 13:16 14:4,25 category 13:19 14:4 caught 47:24 caused 45:25 86:20 101:22 102:10 105:8 121:9 131:12,18 ceased 91:23 center 44:11,17 113:15 138:7,16, 23 139:1	certificate 23:15 92:18 certificates 23:13 cetera 123:9 change 10:16,17 25:11 66:2,21 80:10 146:14 changed 18:13 91:24 changing 21:8 charge 24:9 25:18,23 44:19 106:4 107:1 111:19 charged 24:18 89:16 127:5 charges 25:23 111:12,15 119:20 charging 24:15 chatted 11:24 check 25:6,8,10, 14 37:4 41:7 49:15,17 50:2,25 51:7,12,15 52:4, 20 59:22 86:2,10, 11,21,22,24,25 87:2,13 88:2 95:15 105:18 107:22 108:12,17, 19,23 109:2,4,5, 13,16,17,19,20, 21,23,24 checkbook 50:11,25 52:1 checked 25:9 105:21 106:21 checking 25:22, 24 26:2 31:7 35:10 49:12,23 60:11 61:12 63:6 64:9,12 87:23 91:5 96:25 97:12, 13 106:10 107:5 113:2 114:15 120:20 125:20 129:24 130:1	checks 33:2 38:5,12,21 50:10, 16,22 51:2,19,22 52:5,8 69:22 72:17 95:22,23,24 107:15,21,22 108:1,14,15,21 child 30:23 32:15 57:18 choice 11:14,17 88:15 Civil 6:10 claim 34:21 76:6, 8 77:15 115:1 claims 109:8 class 127:15 classes 35:11,14 clean 143:19 clear 77:3,15 clerk 3:20 132:4 client 14:22 20:18 23:4 24:9,16 26:21,24 28:25 42:23 104:6,10, 19,22 107:1 119:8 clients 14:19 18:21 19:6,12,14, 16,17,18,20 21:10,16 22:22,23 23:2 25:3,23 27:8 36:7,8 39:24 50:20 111:20 131:5,6 close 25:17 closer 46:22 58:22 89:4 closing 36:25 clothes 74:10,15 123:8 clothing 35:14 73:9,20,25 74:9 127:13 clothings 35:12 clue 46:3	Code 6:9 cold 45:1 Collection 119:14,17 collections 20:15 column 104:13 comments 104:21 commingling 77:19 communicate 29:15 53:19 69:9 98:19 communication 14:1 communication s 14:5,14 community 31:1 34:22 35:10 52:15 63:8 71:20 88:5 95:11 107:6 112:7 119:18 127:11 130:7 135:16,18 145:1 company 15:6, 17,23 16:6,7,9,20 18:18 23:14,16, 17,18,22,23 24:2, 6,19,22 26:5,12 27:11 30:6 35:3,6 38:13 39:1 53:21 54:1,25 55:10 64:18 67:10,24,25 68:13,14,17,24 69:2,5,7,11 71:18 82:7 83:7 111:23 112:5,22 113:3 114:8 115:14,20 118:1,3 120:18 125:11,19 126:1 128:24 129:18 134:8 136:8,11, 13,16,18 compared 29:25 76:17 comparison 135:8
---	--	--	--	--

complaint 135:12	contribute 141:17	126:15,17 127:3, 6,9 128:20 129:4, 22 130:17,21 131:3 133:3,14,22 134:5 135:5,13,24 136:2,11 137:8 141:4,7,16,18 142:1,21 144:10	correlate 146:22	71:2 79:1 85:10, 24 92:21 94:23,25 104:17 111:9 143:21
completed 25:21 111:20	contributed 141:15,24		Costco 22:7,10 57:13,14,20 61:6 63:23 112:10,14, 16 113:12	dated 119:13
comply 131:25	contributing 135:24		counsel 41:18,25 43:16,18 77:23 118:21 125:10 145:10 146:13,17, 25	dates 79:21 146:23
compound 134:17 143:12	conversation 77:12	Copilotco's 34:13 82:2 92:12, 15 93:4 98:8 100:8 121:1 122:4 137:17	couple 10:22 17:18 24:20,24 29:3 35:21 81:19 103:10 107:16 113:20,22	day 10:7 39:2 88:16,24 89:1 94:21 101:25 103:7 126:5 132:3,4 133:4 134:3 136:12
comprises 83:22	conversations 146:22	copy 13:12 43:20 78:12 85:8 99:8, 23 100:4,7 127:23	created 38:25 39:1 131:7	days 24:20,24 103:6
computer 64:23 113:1	convicted 7:11	corporate 120:3	court 6:16 10:19 11:3,10,16 80:1, 14 126:22 132:3 145:6	dba 16:18,22,23 17:1,5,7,8,10,14 18:7
computer-based 43:19	copies 82:15	corporation 15:20 16:5,24	credit 24:9,16,18 25:18,23 50:16,20 57:7,17 95:15 102:2 103:3 127:10 130:5	deal 75:15 84:15 131:5
concept 133:10	Copilotco 4:14, 16,19,21 15:15, 16,17,22 16:13 17:17 19:1,5 20:13 23:19,23 24:23 26:22,24 27:8,11,22 28:24 29:12,14 30:12,19 31:9 32:11,19 33:1,10 35:6 37:25 38:2,25 45:4,9 49:5,9 51:2 52:24 53:5,7,16 54:8,12,19 61:9 62:20,24 63:5,24 64:3,12,16,17 66:5,8,11,12,16, 17 68:3 69:17 70:2,21 71:9,15 72:11 73:7,17 74:1 75:4,9 76:4, 9,14 79:6 82:6,7, 15 83:9,23 85:13, 23 86:18 87:19,22 89:16,21 90:4,17, 24 91:15,23 94:9, 13 95:19 96:1 97:10 98:2,4 100:3 101:13,17, 24 102:13 105:8 106:10,13 107:4 108:4,8 110:11,13 111:10 113:8 114:11,13,16,21 115:20 117:4,19 118:1 119:9,10 120:1,12,23 121:19 122:16 123:2 124:15,20, 24 125:3,11	correct 13:18,19, 20 15:1,18 16:3,5 20:6,9 21:7 22:11, 14,18 24:9 25:25 26:1 27:12 28:15, 16,22 30:17 31:3 37:23 38:2,3,19 42:24 44:8,9,11 45:23 46:5,8,9,11, 12 47:14,21,22 48:8,12,15 49:9 50:12,18 51:23 60:7,9 62:21,22 65:1,9,12 69:3 71:16 72:23,25 74:18 75:9,12,24 81:21,24 82:14,21 83:10,11 84:2 85:16,17,21 88:10 89:9,17,18,24 90:5,7 93:2,9 94:7,19 98:3,5,11 99:8,12,23 100:4, 7,8,21,22 105:19, 20 109:11 111:15, 24 116:12,14,18, 19,25 122:19 123:3,4,9 126:10 127:3,6,7 129:14 135:14 136:16,20 137:4	customer 115:25 116:5,9,11,20 117:3	debit 34:24 35:2, 5,15 72:14 102:16,17,20,21, 25 103:3,4,7,11 117:16,18 122:10 126:12,14,18
confirm 67:18 100:12		correctly 45:20 48:22 112:23	customers 113:7	debt 44:20 45:17 72:12 119:18 130:4,5,6,7
confirmed 116:17			cyber 15:24 16:1 64:22	debts 120:11
confirming 98:17			D	December 71:23 83:19
confused 48:23 75:17				decent 128:21
considered 22:24 31:12				decision 23:1
considers 34:19				deck 43:23
consistent 97:7				deduct 114:17 122:4
consultant 109:10				deducted 114:12
consulting 16:13 17:17 53:6				deducting 114:19
contact 40:16 128:6,16			dad 9:10	deduction 51:8
contacts 40:14, 25			dad's 9:10	deductions 28:18,21 121:18
continue 82:3,5 87:18,25			daily 52:13	Defendant 3:10
continued 5:2 81:22			damage 69:7	
continuing 42:9			dash 103:21	
			data 43:17 44:11, 17 104:12 113:15 138:7,16,23 139:1	
			date 6:8 7:9,10 29:23 37:13 42:25	

degree 7:16 82:21	directly 88:8,12, 14	door 109:22	employee 6:12 110:1	examples 94:10
delete 40:5,7	disagree 18:8 28:11 32:7 137:6, 10	draft 16:16	employees 52:21 110:2	exception 11:12
deliver 113:8	discussed 14:12 38:21	drastically 25:11	employer 6:5	exchange 123:19 136:7
depending 104:6	discussion 39:9, 15 42:19 140:15	draw 34:12	encourage 128:16	exhibit 4:11,14, 16,19,21,24 5:4,7 12:20,22 13:10,14 78:4,10,24 79:8 82:11 83:12,13,21 84:5,10,12,13,14, 16,18,19,21 86:1 94:15,16 95:10 98:23 99:3,7 103:19,22 104:2, 15,22 116:16,21, 24 117:3 119:15, 23 121:5,13,20
depends 53:6	discussions 140:1,10	drive 97:4 112:9, 11,13 113:7,15	end 22:17 25:11 27:24 52:17 56:8 75:12 94:22 101:19 107:17 109:9 115:2 132:19	exhibits 4:8 5:1 78:6,17
deposed 11:21	dismissed 132:6,10	driver 112:15,18	ending 29:23 32:6,12	exit 50:21
deposit 50:15 59:25 61:24 63:4, 23 64:3 86:10 87:13 107:23 142:5	dispute 67:20 117:2 121:17,20 122:2,9,11 141:21	drove 112:9,14 114:3	ends 31:17	expand 18:17,19, 22,23 21:9,16
deposited 25:24 62:20 108:2	distinction 8:25	DRUS 119:14,16	engineer 64:23	expense 54:21 71:19 74:14 98:15
depositing 109:19 142:11,20	distinguished 77:5	duties 67:6 83:2	enter 50:21	expenses 32:14 33:3 34:3,10 57:1, 4 71:20 73:4,7,18 77:10,12 96:17 110:11,12,16 114:22 115:5,10 123:8,11 128:19, 23 134:9 135:17
deposition 4:11 6:13 12:21	distracted 42:15	duty 20:10 67:24 68:2,6,13,14	Entprises 6:6	experience 27:5
depositions 78:4,7	distributed 120:17 143:20	earlier 11:23 21:15 83:1,4,10 97:16 101:9 116:8 126:5 129:20	entire 138:19	expired 103:3
deposits 61:11, 15 62:7,24,25 91:6	distribution 121:2	early 47:1,5 101:20 103:9	entitle 136:13	explain 118:14
DESCRIPTION 4:9 5:3	divided 145:2	earning 64:3,8,9, 11	entitled 115:25 121:6 136:15,19, 24	explained 83:1
designate 78:17	divorce 56:2,3,24 81:7 93:25 94:3,5, 22 95:1 131:24 132:1,2,4,5,9,11, 13,18,21,22 144:24 145:1	earnings 63:24	entity 15:20 18:14 23:6	explanation 96:19
designated 130:20	divorced 29:19	easy 43:16	entry 118:22	express 77:9
destination 124:25	document 17:15 23:6 39:9 104:9 116:9	educated 12:2,9 22:3	equipment 113:18,25 114:4	extent 9:20 11:5
device 40:18,20, 21 43:10 117:15, 21,25 118:2,15, 16,19	documentation 92:17	education 7:15	ESQ 3:4,12	eyes 80:18
devices 117:11, 13	documents 4:12 13:3,15,24 14:20, 21 15:3 16:17 23:8 67:17 77:22, 24 92:20 93:14 100:12 128:15	electricity 33:6 46:3	ESS 88:24	
Diego 3:14 6:1 7:20 146:1	dollars 62:11,12 88:19 100:21	electronic 59:22 109:21 110:4	estimate 8:19 9:1,7 28:2 38:12 47:10 62:11	F
difference 74:17 76:25		electronically 88:2 109:25	estimates 97:17	facts 8:10
differently 67:1		Ellisabeth 3:23 6:5	exact 9:5 36:22 37:13 85:24 94:23 102:7 103:8 104:12	
difficult 80:21		email 14:1 15:12, 17 23:4 29:2 39:19 113:2	exacts 9:18	
digits 31:15,25 126:12		emailed 21:3,4	EXAMINATION 4:2 7:1 146:8	
		employed 64:25	examined 6:20	

fair 12:14 59:2 83:21 96:22	finance 111:23 125:17,22,24,25	Fresno 3:6	21,22 103:18 104:11,14 106:4 123:10,12,18,20 124:6,9 128:3 133:25 134:15,24 135:3,7 142:10 144:9	142:14,19,25
fairly 81:19	finances 28:15 125:3,11 130:1	Friday 6:1 146:1	giving 23:7 24:5 28:1 88:9	Hamby's 137:21, 24 138:6
Fallbrook 3:5	financial 26:5 111:21,22 115:13, 19 124:19 129:17, 18	friend 67:14	good 6:4 7:3 9:24 17:24 53:4 82:8 132:20	hand 78:9 83:13 84:4 99:2 123:22 124:1 134:21 143:2
familiar 13:2 79:19 84:1,23	financially 6:10	friends 27:2,3,7	groceries 57:17 73:9,20,25 74:15 123:8,9	hand-give 134:18
family 36:2 96:14 112:8 113:14 127:12,15	financials 125:7, 15	front 10:19 12:18	grocery 35:9,13 57:6 97:1 98:14 108:24 127:11	handed 82:11
faster 28:3	find 22:22 65:12, 13,17,20 128:13	full 22:10 46:14, 17,23 57:15 64:17	Group 3:3 6:12	Handing 104:25
February 6:1,8 85:20 89:16 94:4 100:2 119:13 146:1	fine 10:11 18:12 42:16 47:16 78:2 145:11	full-time 64:4,13, 16,20,25	growing 44:17, 20	handle 28:25
fee 105:17 106:4 108:7	fix 47:25	function 24:15 130:2	guess 9:1,12,14	handwriting 13:13 109:20 133:15
feel 108:19	fixed 53:4	functioned 95:17	guys 30:7 39:12 48:10 50:22	handwritten 13:9,14
fees 89:20 105:7 106:16,20,22 107:11,21 110:21 111:2	flip-through 79:12	fund 31:10 71:19 91:9 109:14 110:18 111:6 122:16	gym 115:8 139:2, 5,14,17,19 140:8, 20,22,25	handwrote 13:13
feet 9:5,7	flow 134:6	funds 24:19 34:12 54:7,11,16, 17,19 80:24 108:8 110:15 120:22 123:6	H	hang 87:3 104:25 118:11 146:21
felony 7:12	flows 124:24 125:18	furniture 57:12, 19	hair 54:19,20,21 74:9	happen 35:19,20, 21 46:1 77:12 106:17 121:10
fence 57:11,19	follow 11:15,18 20:14 29:3	G	half 29:25 30:3,4, 5 88:23,24 89:7 97:2 105:7 106:16 112:21	happened 45:23 47:2,23 48:18 106:3,6,9,19 129:16 144:21
fight 56:1,5 81:4	Food 127:13	games 140:2,11	Hamby 3:19 6:15 67:15,18 68:17 69:2,4,10,16,23 115:9 133:13,16, 18,20,21,23 134:1,7,11,18,24 135:3,7,18,20,23 136:1,6,10,12,14, 19,24 137:7 138:2,8,24 139:4, 14,16,19 140:2,5, 13,14,20,23,25 141:3,6,12,17,24	happening 46:19 76:11 106:8 108:13
fighting 81:22 123:16	foods 35:12	gas 33:15,20,24 74:9 123:9 143:16		hardware 141:7, 15
fight 56:1,5 81:4	forecast 26:14	gathering 8:10		hatred 131:11
figured 48:18	form 16:17 18:13, 18 141:12	gave 37:18 60:6, 24 88:3 89:12 144:10		haul 113:18,25
file 17:7 87:1 94:22,25 132:1,3, 4,5 133:9	formally 124:25	generally 64:24 79:13,17,18		headed 12:4
filed 16:15,19 17:5 95:3 131:9, 10 132:6,9,10,12, 17	formed 16:4,14, 15,20 18:14 23:6 39:6 130:18,21	gift 59:18,20		hear 73:12
files 13:25	forward 44:3	gifts 54:18		heard 19:9
filing 132:2	foundation 130:23	give 8:23 10:25 11:7,8,11 12:9 36:22 42:3 43:15, 18 47:16 49:19 57:7,8 60:2 63:3 76:22,24,25 88:15 95:19 96:19,25 97:2,6,10,19 98:7,		helping 135:24
final 132:10,13	founded 15:23 16:6,7,10,11 66:17			helps 78:15 88:5
finalize 94:3	Franchise 119:20,22 120:10			Hey 10:1,9 20:22 29:21 98:20
finalized 94:1,6 132:13,15,18	frequency 142:4			highest 7:14

history 8:11 53:15 hold 143:10 home 9:4 30:23 32:15 34:3 81:6,7 93:1,4,6 115:16, 18 127:9 129:19 137:18,20,21,24 138:1,3,4,6 144:16,21 145:2,3 honest 32:22 90:10 hot 45:1 hour 10:10 hours 137:8 house 9:10 17:17 30:23 33:4 56:17, 22,24 57:10,12 93:12,16 94:4,9 96:11 115:15 house's 93:4 household 30:12 33:3 34:10 135:9 huge 45:1 human 8:12 73:3, 7,18 humanity 12:11 hundred 88:18, 20,21 143:6,16 hundreds 19:24 husband 22:2,8, 13,16,20 24:12 27:4 131:1	iexplore 43:18 imagine 23:20 immigration 92:20 important 42:6, 15 improper 69:23 70:1,3 inches 9:6 include 13:9 includes 125:15 inclusive 78:24 79:16 income 16:19 35:24 36:4 44:7 63:12 73:4 74:24 75:1,5 76:6,8,13 77:16 107:2 115:1 120:14 133:9 144:6 incorporate 77:25 incorrectly 48:20 INDEX 4:1 indicating 23:13, 16 individual 16:25 17:1,2 120:3,4,8, 11 individually 16:23 information 10:6,10 12:10 19:2 141:9 instance 64:25 instructing 9:21 instruction 11:15,18 insufficient 108:8 interest 134:1 interested 6:11 136:10	interests 95:12 intermittently 29:13 47:20 61:18 internet 15:25 16:1 44:23,24 invest 54:12 invoice 23:2,3 45:20,22 131:7 invoices 19:6,10, 22 20:1,4 29:1 113:2 involve 20:24 64:22 83:6 involving 119:24 137:7 ipad 117:9 IRS 119:19,22 120:10 issue 109:23,24 110:4 issued 87:2 item 118:24,25 119:13 items 57:17 110:20 115:24 119:22 121:8,14	70:7 95:7 joined 31:6 joint 77:16 115:1 120:5,14 133:6 jointly 30:15 judge 11:11	lawsuit 68:5 131:9 134:4 layman 68:9 leads 17:13 131:2 learn 45:12 leave 96:18 left 107:17 LENDEM 3:4 level 7:14 38:7 liability 15:19 life 55:21 56:3 limitation 54:3 limited 15:19 lines 99:14 lining 103:24 link 13:24 linked 127:2,4 128:24 list 13:3,8 40:16 lists 135:12 live 58:2,16 93:18,23 98:13 lived 93:20 144:17 living 9:4 57:1,4, 11 93:16 94:9 LLC 15:16,17,22 16:6,24 18:18 23:19,23 27:11 29:12 66:5,8,12, 16,18 67:9 68:3 LLC's 24:23 loan 112:2 location 137:17 lock 92:24 locked 111:4 log 29:15,22 72:10 90:9,13 102:3 109:24 Logan 3:23 6:5
K				
key 15:3 Khan 3:20 kid 112:19 kids 35:14 54:18 kind 28:2 56:7,10 123:8 124:9 knew 8:20 9:16 44:25 134:3 knowing 50:9 knowledge 9:3 15:21 27:5 30:3 35:23 36:7 47:18 53:4 58:20 69:5,6 125:24 kwon 127:15	L			
La 6:7 label 13:7 lack 48:5 130:22 Land 112:22 landing 25:3 language 56:7, 15 laptop 43:13,14 117:10 larger 95:24 largest 58:17,23 late 81:9,14 101:20 102:7 103:7 law 3:3,11,20 6:12	J			
January 15:8 72:2,3 82:18 83:19 84:25 85:7, 19 86:11,12,16,21 87:14 94:3 127:19 128:3,13 job 20:19,20 23:4 24:11 28:24 53:7 63:7 64:4,13,16, 20,21 65:1,2,3,7, 10,12,13,14,15, 17,19,20 66:2 69:8 80:23 81:12, 18,20 113:12 144:6 jobs 57:9 join 18:18 67:10	I			
icloud 43:8,11 idea 19:3 111:10 identification 12:22 79:8 83:12 84:19 98:23 103:22 104:15 identify 61:14 74:19 75:3 79:1				

logged 111:3,17	make 7:24 8:8,21 10:12,23 19:7,9 20:4,19,20,21 23:1,2 25:20,22 28:3,17,24 29:15 35:16 36:24 43:20 47:21 50:2 53:5, 16 61:25 75:4 77:15 80:15 91:14 102:1 105:15,24 110:9 111:8,19 120:20 125:19,20	matches 43:21	minutes 79:24	96:20 105:10 114:17,20 120:17, 25 123:6 132:25 133:13,22 135:4,8 144:9
login 28:14		matter 6:14	miscellaneous 98:15	
long 22:16 34:6 35:23 47:22 87:17,25 93:23 102:9 129:6		MB 115:13,19 129:17,18	misstates 137:2	
longer 15:13 55:2 65:11 70:22 101:13		MBA 7:17,19	mistake 45:19 47:21 48:4 68:17	month 20:1,4 25:8,9,10,12,13, 14 29:25 35:21 37:1,6,15,20 38:4, 11,12,15 40:12 47:7,18 49:12,16, 17,20,24 52:25 53:10,17 81:16 88:17,19,21 89:1, 3,24 90:7,11 91:5 94:5,10,18 96:7 97:9,18,20,21,23, 24 98:2,4,6,11 99:16 102:6 103:10 106:22 107:15,17 123:7, 13,17,18 124:4 130:12 140:19,24 141:1
looked 15:2,5		meaning 75:18	mistakes 47:22 68:18 69:2	
losing 81:6	makes 11:9 22:20 43:16 66:7	means 13:23 21:21 65:19 125:18 137:18 141:9	mixing 97:14	
loss 26:6	making 19:10 22:25 52:25 72:11 82:7 130:16	meant 126:7	mom 57:7,25 58:7 60:5,10 61:8 63:9 81:17 97:10, 19 98:13,20,21,22 123:7 143:17,20	
lost 57:9 63:7 65:1,2,3,7,10,14, 19 80:23 81:12		medication 17:25	mom's 57:21	
lot 35:11 38:8 40:1 42:2 96:5,24 97:4 121:9 123:15 129:7 137:7 146:19	manage 82:22,25	meet 109:10	moment 79:10 83:15 87:16	
lots 10:3	managed 82:23	meeting 11:23 146:13,16	money 19:13 20:18 28:21 32:17,20,22 34:1 35:13,14,15,18,25 38:9 39:3,13,16 45:5 48:7,10,14, 19 49:6 50:3,16, 21 52:14,16,24 53:4,11,20 54:4, 25 55:7,10,14 57:24 58:17,23 59:3,7 61:5,6,7, 21,24 62:1,5,6 63:13 65:8,22 69:11 71:9,16 72:11 73:8,10,19, 24 77:14 80:24 81:1,3,9 82:1,2,5, 8 87:21,22,23 88:1,5,9 91:14 94:8 98:12,20 105:14,25 106:4, 10,13 108:3 109:8 111:7 114:14 124:11 125:19,20 129:3,10,23 133:8,25 134:8,16 144:9	
louder 80:16,17	manager 130:17, 21 131:1,3	member 23:12, 16 66:4,7		
lower 87:6	managing 82:21	memories 40:8		
lunch 145:4 146:13	March 82:17 84:25	memory 9:20 17:25		monthly 19:18 36:18,20 45:10,13 46:10 47:19 127:16
luncheon 145:15	mark 12:20	mention 93:13		
Lux 6:5	marked 12:22 78:9 79:8 83:12 84:5,19 98:23 99:2 103:18,22 104:15	mentioned 15:15 18:12 21:8 44:15 48:4 54:18 61:6 63:11 65:6,7 75:22 80:22 81:5 83:5 101:9		months 15:7 20:22 24:13 48:10 53:5 65:14,15 71:14 81:14,19 85:19 90:3 91:16, 22 92:2,4,8 96:4,5 103:6 124:13 130:13,15 132:7
M	market 26:21,23, 25 27:1 54:12,14	Mesa 6:7		
machine 25:19 45:2	marketing 17:16 26:11 113:7	message 41:9		morning 6:4 7:3
machinery 92:1	marriage 57:22 61:7 63:13,14 132:1	messages 39:23, 25 40:1,4,6 41:3, 17 42:1 44:2 98:16 146:20		mortgage 33:9 34:4,7 111:22 115:14 129:18
machines 45:7	married 17:17 57:2,5 120:9	met 63:20		mother 58:19,24 59:3,7,15,21 61:1, 2,5 62:7,19 96:10 97:1,22 98:2,7,12 132:21 143:9
Madam 80:1,2 126:22 145:6	married-couple 17:4	middle 7:7 78:15 100:25 103:21		mother's 92:19
made 22:1 28:20 45:19 46:7 58:8 62:24,25 68:17 69:2 74:16 86:2 105:19,22 107:15 121:18 141:11	mask 80:18	million 62:11		move 31:10 44:3 114:20 120:25
majority 22:7,12, 13,15,19	master 7:16	mind 10:16 29:17 77:1 105:23 125:21 131:8,12 133:4	monies 57:19,20, 21 59:17,21 63:12,19,23 73:6, 17 74:19 82:3 85:21 87:18 94:12	moved 94:4,6 98:13
	match 22:4 25:17,19,24 116:13	mine 13:17		

multiple 47:16		117:6 119:3 128:1,10 134:12	59:16 77:4	45:9 48:5,11,19, 21,22 49:6 50:20 51:12 52:9,20,21 57:1,4,6,7,9,11 63:8 73:8,19,25 74:25 75:7,22 81:9,15 87:20 88:4,5,8,11,14 89:7,10 91:7,10, 12 95:15,20 96:16 109:25 110:1 114:16,21 115:2, 5,10 120:14,16 121:2 123:7 127:14 129:4,21, 23 130:1 144:8
N	O		owing 19:8	payable 107:15
narrow 35:1	oath 6:20 10:15 146:10	open 73:5 133:5	owned 66:13,15 67:8 133:8	paying 27:7 29:6, 24 33:6,9,14,20 34:4,10 45:4 107:4
National 7:20	object 125:10	opened 27:11,21	owner 17:18 23:5 67:6,24 68:3 136:5	payment 46:7 47:19 110:4 115:20 120:15,21
needed 18:19,23 21:10 35:13 65:22	objection 11:9 44:12 68:8,20 75:18 77:3 125:6, 14 130:22 131:15, 19 134:17 137:1	operate 96:1	ownership 67:5 136:7	payments 22:25 25:2,7 29:16 114:7 119:25 120:9 128:21
needing 51:16	objections 11:6, 10	operating 24:4	P	penalty 10:15
negotiation 131:5	obligated 30:9, 11	operations 91:23	p.m. 145:14,15,16 146:2,6	pending 126:21
net 52:25	obligation 31:1 63:9	opinion 68:9	pages 5:5,7 12:25 79:10 103:25 104:14,25 105:6 119:23	people 8:14,15, 16 21:1 29:3 51:25 137:13
night's 17:24	obligations 24:5 34:22 35:10 88:6 95:12 107:6 121:3 127:11 135:16	opportunity 10:22	paid 20:4,19,20 33:24 46:14,17,23 47:18,24 48:20 51:16 57:19 59:17 105:7 119:25	percent 66:14,16, 22,24 67:3,6,8,18, 21 134:1 136:4,7, 13,15,23
Ninety 58:5	obtain 7:17,19 57:24	oral 133:17,19	paper 12:17	percentage 23:14 66:21
nominated 24:1	obtained 16:18 43:1 63:20	orally 39:16	papers 12:18 146:19	perfect 8:12 28:1
noon 145:5	occasionally 21:4 46:7	OTTILIE 3:11,12 14:11 41:21 42:10,13,17 44:12 53:1 68:8,20 71:4 74:7 75:17 77:2 78:2,12,16,20,23 79:1,4,15,20 83:17 84:7,13 85:1,5 86:5 87:3, 6,9 93:16,20 101:1,3,7 104:2,4 105:2 116:2,4,24 118:4,7,11,20,25 119:3,6,10 120:2, 4 122:6 125:4,6, 14 126:20 130:22 131:14,19,21 132:12,16 134:17, 20 137:1 138:10 142:13 143:11 144:22 145:11	paperwork 67:2 92:18,22	period 29:13 49:5 61:19 65:11,22 66:1 84:25 129:8
normal 102:1	occur 105:8	overdraft 89:20 105:7,15,17 106:16,20,22 107:11,21 110:20, 21 111:2,13,15	Pardon 83:17 134:20	perjury 10:15
note 59:16	October 117:10, 15	overdrawn 105:12	part 22:22 84:12 132:8 134:24 135:18	Permanently 104:4
notice 4:11 12:20 13:1,4 46:13,16	offer 27:6	overdrafts 89:15	partial 63:4,5 88:22 96:25	permission 110:5
November 37:12,13,16,19 55:5 70:17 71:1,4, 10,12,21 72:24 79:4,5 82:16,18 85:24 90:15 91:6 94:11,14,19,23 126:19	offered 133:25	owe 19:12 47:25 48:21 88:6	particulars 5:4,7 104:10	
November/ december 127:18	office 3:11 8:3 91:15 92:2,5,8,12, 15,20,22,23 93:1, 4,5,6,14 119:5 137:18,22,25	owed 20:18 44:11,17 48:24	party 32:16,17 120:9	
number 4:9 5:3 8:13 25:19 31:16 32:1 36:22 40:17 76:24,25 77:1,24 78:6,22 122:3	officer 24:1		passed 144:14	
numbered 103:25	oldest 41:10 42:22		passport 92:18	
numbers 32:12 40:14,25 78:5,24 84:7,17 99:3	one-third 136:20, 24		pay 19:7,10,17 20:7,21,23 21:2 29:3,12,21,22 30:4,5,8,9,11 33:3 34:2,4,7,8 35:9,10	
numerous 89:20	online 15:5 25:2 46:4 72:10,19 79:14 82:20 102:14 113:2			

person 6:14 20:15 21:10,12, 14,17 61:4 122:14 132:20	103:2 113:20 141:13	profit 26:6 35:25 36:1 52:17 76:4,6, 7 77:16 109:8 115:1 136:10	111:7	32:7 117:2 121:17,20 122:2, 9,11,12,13 137:6, 10 141:21
personal 31:2,3, 22 32:3,10,14,18 33:25 34:14,15 38:13,22 39:7,17, 21 52:17 54:17 58:8,14,18,24 59:4,7,25 69:11, 14 71:15 73:1 75:5 77:11 92:17 112:6 113:11 114:19,20,21 115:5,10,16 119:25 120:2,16, 18 121:2 123:15 129:21,25 130:1,5 132:25 133:1,11, 13 134:9,21 142:5	pool 9:9,11	profits 36:4,24 44:7 52:25 53:10	putting 50:15	reasoning 22:4
personally 30:7, 24 98:22 111:7 134:16	portal 46:8	program 43:19	Q	reasons 17:23 18:3
perspective 19:1	portion 12:19 88:20,24 110:22	programming 26:18	Q-U-Y-N-H 7:8	recall 34:11 36:23 46:18,19 47:4 58:21 59:9,12 66:3 71:13 74:22 76:21 86:13 87:15 89:2 90:10,12 92:10 93:13 96:23 103:4 108:5 111:16 115:22 117:12,22 121:16 123:14,24 124:11 129:5,11 130:10 133:24 139:15 143:4,22
phone 40:8,9,11, 13,15,17,25 41:3, 8 42:23 43:1,4,10, 11,13,17 117:9	positive 61:25 111:8	projects 19:19 26:12	quarter 30:1	receiving 103:13
phrase 75:19 125:7 136:5	potentially 26:23	promissory 59:16	question 8:7,19 9:24 10:9,18 11:13 12:6,7,13 16:8 17:19,21 18:10 35:2 50:13 55:18 73:12 83:7 84:21 85:1 86:6,7 87:24 88:13 94:17 113:4 122:8 125:23 126:21,23 129:20 135:25 142:2,8	receipt 118:18
phrased 12:6	prepare 26:4,14, 16	properly 128:24	questions 9:25 12:4 42:9,15 44:2 49:21 134:5	receipts 117:23
physically 69:14	prepared 29:2	propose 78:3,8	quick 79:23	receive 67:2
piece 12:17	prescription 17:25	protest 108:25	quickly 81:19	received 12:16 13:4 25:20 41:9 104:9
place 6:14 51:7	Present 3:18	protracted 65:21	Quynh 7:8	recess 80:5 145:15
places 15:3,10 96:11	pretty 22:23 29:19	provide 15:6 128:1	R	recollection 69:1
plaintiff 14:6	Previous 43:12	provided 13:22 14:7	R-E-E-D 7:8	record 7:4 41:12 42:19 61:20 73:16 80:2,4,7 145:9,14 146:6
Plaintiffs 3:2	price 131:6	providing 15:24	racquetball 139:21 140:2,4,7, 11	Reed 3:10,19 4:2, 12 6:13,15,19 7:8 18:7 42:23 55:12 56:20,23 57:1 60:25 69:25 70:1, 18 78:11 80:22 82:12 83:14 84:6 87:18 88:7,11 89:7,20 90:19 91:22 92:3 93:10 115:9 116:10 129:14 130:17 131:2 138:3 140:3 141:19 142:3,10,
plans 22:5	primarily 112:14 127:8	pull 34:16,18 35:3,16 38:8,9 82:3,5 110:15,17	ran 131:4	
play 140:4	primary 112:15, 18	pulled 34:23 91:14 95:25	range 38:4 62:14 97:17,21	
playing 43:23 139:21 140:6,9	prior 90:3 111:4 130:11	pulling 82:2	rare 21:4 92:5	
point 8:20 31:7 36:10 41:4,6 45:8 70:20 78:13,18 80:23 101:12	priorities 107:5	purchase 117:12,13	rarely 21:6	
	private 88:16	purchased 117:11,25 118:19	Raza 3:20	
	problem 18:1 42:14 75:11,14, 19,25 143:13 146:20	purchases 35:16	reaches 11:12	
	Procedure 6:10	purpose 34:22 74:1,6,9 104:13	read 73:13,15,16 84:7 87:10	
	proceeds 136:15,17 144:10	purposes 39:13 71:16 95:10 135:14	realize 61:23 105:21 106:7	
	produce 13:23	purse 60:21	reason 9:17 17:22 18:8 28:11	
	produced 14:13, 15,18,22 39:23 40:2 41:17 104:19,22 127:17	put 35:9 45:2 59:7 60:22 61:7 62:2,5 69:20 70:7,10,11 96:8,11,24 97:8 100:24 101:15,17		
	producing 14:15			
	Production 4:12			

13,15 143:3 144:17 146:21 Reed's 64:20 93:4 100:20,24 135:14 refer 30:14 77:24 78:20 101:5 reference 77:25 referencing 87:4 referring 30:11, 12 94:15 130:9 reflect 67:18 register 50:25 regular 96:2 123:23,24 124:2, 3,7,8 134:25 144:5 regularly 25:5 113:16 137:17,21, 24 rejected 108:3 relate 41:19 related 14:1 17:15 64:23 relating 125:18 relationship 63:15 91:22 relative 6:11 remainder 100:11 remember 8:16, 22,23 9:18,19 10:8 17:12,15 27:19,23 28:7 29:20 31:18,25 32:11,21 33:8 34:6,9,18 36:23, 25 37:13 38:8,16 43:2 46:24,25 47:4,8 49:20 58:25 59:9,12 62:10,14 64:21 65:1 66:2 71:12, 13 76:11 77:18 81:13 86:14,15 88:18 94:23,25	97:11,15,16 102:7 103:8,12 112:23 115:8 118:17,18 126:11 130:11,16 143:22 remodeling 57:10,18 remotely 3:23 6:14 137:14 removed 71:21 72:9,22 85:15 101:14,18,19,23 102:5,10,16,18, 21,23 111:9,12 rent 34:4 45:6 rephrase 10:3 59:15 90:2 135:25 report 52:16 reporter 6:16 11:3,11,16 73:15 80:1,14 126:22,24 145:6,8 represent 116:22 119:10,21 request 4:12 104:10 118:5,9 resentment 131:11 reserve 44:1 respect 125:14 response 13:24 55:24 104:9 responses 13:18 responsibilities 24:5 29:5,8,11 52:15 120:11 responsibility 24:8,10,14 responsible 110:22 124:22 126:7,8 responsive 13:15 restore 43:14	restroom 79:23 RESUMED 146:8 retrieve 128:14 retrieved 85:8 return 56:4 118:2 returned 119:4 143:18 returning 10:24 returns 120:4,5 revenue 26:14 right-hand 87:7 ro@ottilielaw. com 3:16 ROBERT 3:11,12 Rod 13:21 14:7, 12 18:17 67:10, 11,12,14 138:5 140:4,22 141:17 Roderick 3:19 6:15 role 19:4 20:10 83:2,6 136:2 roof 57:10,18 room 9:4,9,11 57:11 60:21 Rough 62:11 routine 51:10 64:7 102:1 Rover 112:22 ruin 55:13,18,22 56:3,15 ruined 55:21 56:4 ruining 56:13,14 run 22:7,13,16,19 30:23 102:2 135:9 <hr/> S <hr/> San 3:14 6:1 7:20 146:1 satisfy 79:22	save 40:3,7 51:11 96:10,16 saved 48:10 savings 60:11 school 35:11,14 57:6,18 74:10,15 88:16 92:19 scroll 42:9 111:17 scrolling 42:7 Secretary 16:16 24:2 section 84:10 121:5 security 15:25 16:1 64:22 sell 81:6 136:11, 13,21 send 19:22 20:3 23:2,4 29:2 59:3, 21 sending 19:6,10, 21 113:1 sends 96:20 sense 8:8,21 10:12 separate 37:11 94:21 separated 15:14 37:10 55:4 70:13, 17 87:17,21 88:8, 12 89:8,19 90:16 91:17 92:2,9 94:18 129:2,13 143:3 separately 84:6, 10 separation 90:3, 8 92:4,11,13,16, 21 93:3,21,23 95:3 98:11 130:11,14 143:10, 21,25 server 26:19 27:3 113:18,25 114:3 131:4 137:7	141:18,25 servers 45:2,3 91:13 141:4 service 15:25 16:2 43:11 44:23 Services 44:24 SESSION 146:4 set 53:17 115:19, 22 131:4 settlement 119:18 130:4,6 setup 64:7 shape 141:12 share 23:11 27:2, 3 77:13 78:14 shared 18:16 shares 23:7,9 sheet 26:9 shoes 74:10,15 shopping 97:1 98:14 short 81:8 82:1 88:16 129:8 show 40:25 41:3 109:22 142:3,10, 19 showed 142:16 showing 67:2 shown 95:10 104:22 121:19 sic 82:16 121:7 side 87:7 sign 17:8 24:4 28:5,7 signatory 101:10,13 102:18 signature 28:9, 10 54:4 86:25 99:9,20,24 100:4, 7,15,19,20,25 116:14,18 signatures
--	---	---	---	---

100:13	specific- 95:13	stock 54:12,14	talking 23:19,20 30:6 42:6 64:12, 13 77:18 83:3,10 118:22	42:1,22 44:2 93:10 98:16,20 109:5 133:21,23 146:20
signed 23:6,8 28:5 54:4 116:9, 11	specifically 94:14 95:14 136:23	stop 54:24 82:2	Target 15:4,9 127:2,6,8,10,14, 17,23 128:20 129:4,7,9,11	Thanksgiving 94:24
signer 70:8,9,14, 15,20,22 71:18,22 72:10	speculation 131:15 137:2	storage 43:14	taught 96:14	thing 19:11 28:2 74:12,13 84:22
signing 23:10	spell 7:4	store 45:3,6	tax 16:19 17:15 34:20 52:17 74:23,25 75:5,6,7, 8 76:13,16,23 77:3,15,22 109:7, 10,11 115:2 119:22,25 120:4, 5,10,14,15 121:3 133:9	things 9:19 41:22 44:6 54:17 73:8, 20 93:7,11 113:7 126:6 131:25 133:11
silence 41:12	spend 32:17	stores 117:8	taxed 74:20	thoughts 22:4
silver 103:24	spending 33:2 73:6,17	straight 114:18	taxes 75:16,22 77:4	thousand 19:24 62:12 100:20 143:24
simplify 35:1	spent 129:4,9,10	Street 3:13 6:6	technical 22:22 26:19 44:19	three-quarter 30:1
single 97:7 111:18 121:16	split 88:23 112:21 124:12	stuff 22:25 73:9, 21 95:20	technically 19:1	tight 80:24
singular 65:7	stack 12:18	substantial 44:11	teller 70:9 102:4, 22 106:11	tile 57:11
sir 137:23	staff 8:2	success 26:24	telling 107:3 115:9 132:1	till 22:17
sit 75:3	stalking 111:17	sufficient 35:17 61:23 69:6 91:6 110:18	tells 11:13 131:23	time 6:9 10:3 13:2,5 18:24 19:7, 10 21:4,24 22:1,5, 9,10,13,16 29:14, 17 30:1,2,4,5 34:7 37:8 40:11 41:5,6 44:13,16 46:18,25 47:4,8,13,22 49:4 55:23 57:15 58:1, 21 59:1,10,11,13 61:19 64:17 65:5, 8,12,22 70:14,24 71:10,15 76:21 80:4,7 81:8,10 84:24 86:14 90:24 92:10 93:7 96:24 97:4,7 100:14 101:15 103:13 110:5 111:4,5,14, 16 125:10 126:12, 17 129:5,6,8,12 130:12 132:18,19, 25 137:20,23 139:15 142:9 143:4,10 145:14 146:6
situation 48:13	stapled 12:19	Suite 3:5,13	template 23:3	timeline 103:12
size 21:21	start 36:6 44:20 54:8 95:18 133:5	supervise 53:25	temporarily 104:4	
Skipped 4:24	started 32:25 36:10,21 38:6,17 44:17 81:1 95:18	supplies 141:15	tempting 12:8	
skipping 104:3	starting 36:6,14 41:22 107:9	support 82:8	ten 19:24 59:11 65:3 123:14	
sleep 17:24	state 7:3 16:16 24:2	surprise 104:5	term 125:15	
smaller 76:16,20 84:14	statement 15:4,5 61:12 108:13 109:23 124:24 128:2,9 134:22 137:11	swear 6:17	testified 6:21 10:23 116:8 126:6	
smart 12:2,9	statements 4:14, 17,19,22 15:6 26:5,7 77:22 79:7, 14,16 83:23 84:1, 24 111:3 127:18, 24 128:5,7,17 134:15,19	system 64:22	testify 18:4	
softly 80:13	status 144:16,18, 19	T	testimony 10:17 17:23 80:10 85:12 89:14 137:2 146:12	
software 43:16	step 81:17	T-R-A-N-G 7:7	text 39:23,24 40:1,4,6 41:2,9,17	
sold 43:6 56:18, 23 136:19	stepfather 144:14	tab 100:24 101:4		
son 29:18,20 113:13	stick 13:7	table 9:9,11		
sort 17:16 23:12 26:4,16,18 68:16 97:17,21		tae 127:15		
sorted 104:12		taking 4:11 6:13 36:4 38:5,21 50:14 51:5 53:11 54:25 55:7,13,18 73:8,19,24 94:8 115:20 134:8,16 142:21		
source 63:11		talk 22:22 23:22 41:22 53:16		
space 45:6		talked 52:13 53:15 140:13,14		
speak 80:13,16, 17				
speaking 11:5				
specific 53:10				

times 12:1 29:3 35:21 47:24 49:16 65:2,4,6 90:13 98:22 113:21,22 124:13 138:15 140:19,24 141:2 today 7:23,25 8:5,10 9:14 10:7, 11,16 12:12,17 13:4 17:23 18:1,4 23:21 28:3 65:6 126:6 134:4 143:25 146:12 today's 6:8 12:20 104:17 told 7:25 8:2,3,6,8 18:6 21:18,20 24:12 28:9 32:6 45:9,17 48:17 55:22 66:9,14,18, 20,25 67:9 68:15 70:9 72:9 73:5 102:4,22 111:5 114:24 121:4 127:25 128:2,10 132:4,19 136:9 137:5 141:9,17 top 107:5 topic 81:4 topics 81:5 total 19:20 25:17 58:1 62:15,16,18 88:21 110:20 135:11 totaling 115:25 121:7 129:1 totally 54:20 track 51:17,19 tracking 62:9 Tracy 3:19 6:15 13:21 14:6 15:23 16:18,22 17:2,6,7 18:16 19:7,12,18 20:7,12,21,24 21:18 27:16,17 28:4 29:2,14,21 31:6,7,8,12 33:22 34:7,19 36:13 38:20 39:6 41:9	44:19 45:9,19 48:17 51:21 52:1, 4,8,13 53:7,9,21 55:12 56:20 58:2 59:3 60:6,25 61:22,24 63:3,15, 20 64:2 66:9,14, 15 67:9,14 68:15 69:20 73:4 74:10 75:2 77:8 81:12 82:24 87:20 97:3, 13 98:17 100:20, 24 103:2 106:23 107:3 108:20 109:1,3,11,12,15, 18 111:7 112:7,21 113:4,14 114:9, 15,24 115:18,22 117:12 120:13 121:4 122:15 123:11,13,18,19 124:2,6,9,23 125:13,24 126:7 127:12 129:2 130:3,17 131:2,24 133:8 136:9 137:5 141:10,17 142:16 145:2 Tracy's 17:14 20:19 31:22 32:18 58:18,24 59:25 trade 43:6 Traded 43:8 Trang 3:10 4:2,12 6:13,15,19 7:7 trang@- 15:13 trang@ copilotco.com 15:12 trang@ ultraviolet.org 15:12 transaction 25:21 61:4 72:9 75:4 79:12 102:2 105:15 111:18,20 121:16 transactions 71:9 123:15 127:5 128:25	transcript 77:22 78:1,18 92:19 96:19,21 97:8 transfer 40:14 59:22 87:21 88:5 129:25 transferred 43:10 88:1 transfers 28:17, 20 58:7 transition 18:15 travel 95:20 113:14 144:13 traveling 34:19 35:11 treat 36:1 39:2 133:3,6 trial 10:17 78:5 132:19 trinity@ copilotco.com. 15:13 trips 34:19 Troy 35:11 57:6 74:10 92:25 98:15 113:13 127:12,13 true 13:18 48:16 82:14 85:17 98:10 99:8,23 100:3,7 129:3 140:17 truth 10:16 truthfully 18:4 turn 11:5,6,7 43:3 type 11:4 types 117:11 <hr/> U <hr/> U.S. 4:14,16,19, 21 27:20,22 31:8 33:1,3,7,16 34:9, 13 35:5 37:2,24 39:1 54:5 61:23 63:22 70:7,15,21, 25 71:17 73:11 74:4 79:6,13 82:6,	15,23 83:4,9 85:13,23 87:2,22 90:4 95:6 101:13, 23 102:13 109:13 111:6,10 114:10, 16,25 120:14 122:16 125:19 133:3,5 134:5,25 135:13 understand 7:23,24 8:11 9:20, 22,23 10:2,4,14, 19,20,25 11:2,3, 19 13:8 14:3,16, 19 16:20 17:20 21:13,19 49:21 66:10 67:5,23 68:6,14 74:5 77:8 80:14,20 82:24 90:23,25 91:2 95:8 101:11,12, 14,22 105:13 116:16 118:9 128:19 132:24 135:15,23 136:1 140:15 144:22 146:10 understanding 21:11 23:18 28:25 36:9 45:5 52:24 64:19 68:11 77:17 98:18 108:7 131:17 136:12,14 understood 44:6 64:24 132:25 unintelligible 25:19 University 7:20 unusual 92:1 <hr/> V <hr/> vague 44:12 68:20 125:6 143:12 vary 58:25 vehicles 33:14, 15,21 verbal 98:20	versus 6:15 Vietnam 144:13 view 25:2 virtual 128:2,11, 12 visit 92:12,15 Volume 4:3 <hr/> W <hr/> wait 41:21 125:4 131:14 waiting 106:23 walked 12:17 wanted 93:11 Webb 3:3,4 4:5 6:12,16 7:2 10:1,9 12:23 14:16,17 41:23 42:12,16,21 44:14 53:2,8 68:10,22 71:7 73:23 74:11 75:20,21 77:6,7, 21 78:3,14,19,22, 25 79:3,5,9,18,25 80:8 83:13,20 84:9,15,20 85:4, 11 86:9 87:5,8,12 93:22 99:1 101:2, 5,8 103:23 104:3, 5,16 105:4,5 116:7,25 117:1 118:6,8,13,23 119:5,8,11,12 120:3,6,7 122:7 125:5,8,16 126:2 127:1 130:24 131:16,22 132:23 134:23 137:3 138:14 142:15,18 143:14 144:25 145:4,9 146:9 webb@ webblawgroup. com 3:8 week 103:14 weekly 25:6
---	---	---	--	--

weeks 10:22 95:2 103:6,10,15 118:2 129:8,9,11	written 50:11 51:12,20 52:5 69:23 86:12,21	
West 3:5,13	wrong 68:23	
withdraw 50:5,6, 7 61:21 105:14, 16,25 106:2,12 121:15 122:15,16 123:20	wrote 50:22 51:7, 22 86:22 107:21 108:1,15	
withdrawal 99:11 100:2 105:19,22,24 115:25 116:5 121:6,24 122:1,15 123:2	<hr/> Y <hr/>	
withdrawals 82:9 90:14 91:7 116:9,11,21,23 117:3 121:10,18 122:3	year 7:21 27:21 33:17 35:19,20 36:3,7,24,25 37:17 38:17,20 43:12 52:18 53:1 56:7 57:13 58:17, 25 59:3,5 62:15 65:15 66:19 71:5 75:2,15 80:23 89:3 107:18 109:9 113:23 115:2 124:13 128:5 135:4 138:20,21, 22 139:7 141:2	
withdrew 50:1,2, 24 71:19 105:10 123:5	years 36:19 41:15 44:10,15 47:16,20 49:19 56:10 58:15 59:6 65:3 75:11 76:14 82:19 84:2 90:12 113:22,24 114:1 117:14 123:15 139:6 140:21	
witnesses 60:24	<hr/> Z <hr/>	
woman 12:2,9	Zoom 6:14	
word 55:15,20,22		
words 144:23		
work 22:6 26:11, 19 54:1 64:12,17 72:15 102:17,21 112:10,11,12 131:5 137:7,8,13 138:6		
worked 22:6 57:13		
working 22:9 57:14 137:12,16 138:3,8,11,13,24, 25		
write 11:17 51:2,8 52:20 103:20 107:22 108:16,18, 20 109:2,21		
writing 33:2 39:10 108:14,23 109:4,5,17,18 133:12		