

In The Matter Of:

*Securities and Exchange Commission v.
Creative Capital Consortium, LLC, et al.*

*Dorothy Delisfort
August 13, 2009*

*American Court Reporting Company, Inc.
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Original File 58664.TXT

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<p style="text-align: center;">UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA</p> <p style="text-align: center;">CASE NO.:08-81565-CIV-HURLEY/HOPKINS</p> <p>SECURITIES AND EXCHANGE) COMMISSION)) Plaintiff,)) vs.)) CREATIVE CAPITAL CONSORTIUM,) LLC, A CREATIVE CAPITAL) CONCEPTS, LLC, and GEORGE L.) THEODULE,)) Defendants.)</p> <p style="text-align: center;">- - -</p> <p>The deposition of DOROTHY DELISFORT, taken on behalf of the Plaintiff, taken pursuant to the Federal Rules of Civil Procedure, the reading and signing of the deposition being waived; taken before Gala M. Reznick, Certified Court Reporter and Notary Public, commencing at 9:48 p.m., on this the 13th day of August, 2009, at the Securities and Exchange Commission, 3475 Lenox Road, Suite 500, Atlanta, Georgia.</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">C O N T E N T S</p> <p style="text-align: center;">E X A M I N A T I O N</p> <p>Page</p> <p>Examination by Ms. Paulose.....6</p> <p>Examination by Ms. Van Vliet.....76</p> <p style="text-align: center;">E X H I B I T S</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Plaintiff's Exhibit No.</th> <th style="text-align: left;">Description</th> <th style="text-align: right;">Page Marked</th> </tr> </thead> <tbody> <tr><td>45</td><td>Notice of Deposition</td><td style="text-align: right;">15</td></tr> <tr><td>46</td><td>Letter dated July 30, 2009 to Rachel Paulose from Buddy Parker</td><td style="text-align: right;">16</td></tr> <tr><td>47</td><td>Transcript of the deposition of Dorothy Delisfort taken February 8, 2009</td><td style="text-align: right;">25</td></tr> <tr><td>48</td><td>Georgia Secretary of State Documents for Wealth Builders Circle</td><td style="text-align: right;">35</td></tr> <tr><td>49</td><td>Georgia Secretary of State information for Wealth Builders Circle</td><td style="text-align: right;">36</td></tr> <tr><td>50</td><td>E-mail dated August 4, 2008 to Dorothy from Magda</td><td style="text-align: right;">39</td></tr> <tr><td>11</td><td>E-mail dated September 26, 2008 to Linda S. Schmidt from Berthrum Brewster</td><td style="text-align: right;">41</td></tr> <tr><td>9</td><td>Creative Capital Consortium Business Plan</td><td style="text-align: right;">46</td></tr> <tr><td>51</td><td>optionsXpress Individual Account Application for Dorothy Delisfort</td><td style="text-align: right;">52</td></tr> <tr><td>52</td><td>Account Statements from optionsXpress for Account No. 0535-2869</td><td style="text-align: right;">54</td></tr> </tbody> </table>	Plaintiff's Exhibit No.	Description	Page Marked	45	Notice of Deposition	15	46	Letter dated July 30, 2009 to Rachel Paulose from Buddy Parker	16	47	Transcript of the deposition of Dorothy Delisfort taken February 8, 2009	25	48	Georgia Secretary of State Documents for Wealth Builders Circle	35	49	Georgia Secretary of State information for Wealth Builders Circle	36	50	E-mail dated August 4, 2008 to Dorothy from Magda	39	11	E-mail dated September 26, 2008 to Linda S. Schmidt from Berthrum Brewster	41	9	Creative Capital Consortium Business Plan	46	51	optionsXpress Individual Account Application for Dorothy Delisfort	52	52	Account Statements from optionsXpress for Account No. 0535-2869	54
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<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES OF COUNSEL:</p> <p>2 For the Plaintiff:</p> <p>3 RACHEL K. PAULOSE, Esq. 4 Senior Trial Counsel 5 United States Securities 6 and Exchange Commission 7 801 Brickell Avenue 8 Suite 1800 9 Miami, Florida 33131 10 305-982-6318 11 pauloser@sec.gov</p> <p>12 For the Receiver (via telephone):</p> <p>13 THERESA VAN VLIET, Esq. 14 Genovese, Joblove & Battista 15 200 East Broward Boulevard 16 Suite 1110 17 Fort Lauderdale, Florida 33301 18 954-453-8012 19 tvanvliet@gjb-law.com</p> <p>20 CARMEN CONTRERAS-MARTINEZ, Esq. 21 Genovese, Joblove & Battista 22 4400 Bank of America Tower 23 100 Southeast Second Street 24 Miami, Florida 33131 25 ccontreras@gjb-law.com</p> <p>For the Defendant George Theodule (via telephone):</p> <p>RUSSELL C. WEIGEL, III, Esq. Russell C. Weigel, III, P.A. 5775 Blue Lagoon Drive Suite 100 Miami, Florida 33126 786-787-0456 rweigel@investmentattorney.com</p> <p>For Dorothy Delisfort:</p> <p>BUDDY PARKER, Esq. Maloy, Jennings & Parker 75 Fourteenth Street, N.W. 25th Floor Atlanta, Georgia 30309 404-875-2700</p>	<p style="text-align: right;">Page 4</p> <table border="0" style="width: 100%;"> <tbody> <tr><td>53</td><td>Copies of optionsXpress orders for Account No. 0535-2869</td><td style="text-align: right;">57</td></tr> <tr><td>54</td><td>optionsXpress Joint Account Application for Dorothy Delisfort and Edwige Benoit</td><td style="text-align: right;">59</td></tr> <tr><td>55</td><td>optionsXpress Account Statements for Account No. 0540-0635</td><td style="text-align: right;">62</td></tr> <tr><td>56</td><td>Copies of optionsXpress orders for Account No. 0540-0635</td><td style="text-align: right;">65</td></tr> <tr><td>57</td><td>Declaration of Records Custodian of Russell C. Weigel, III, P.A. attaching business records</td><td style="text-align: right;">73</td></tr> </tbody> </table>	53	Copies of optionsXpress orders for Account No. 0535-2869	57	54	optionsXpress Joint Account Application for Dorothy Delisfort and Edwige Benoit	59	55	optionsXpress Account Statements for Account No. 0540-0635	62	56	Copies of optionsXpress orders for Account No. 0540-0635	65	57	Declaration of Records Custodian of Russell C. Weigel, III, P.A. attaching business records	73																		
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1 PROCEEDINGS
2 (Whereupon,
3 DOROTHY DELISFORT,
4 was called as a witness and having first
5 been duly sworn, was examined and testified
6 as follows:)
7 EXAMINATION
8 BY MS. PAULOSE:
9 Q Ms. Delisfort, could you please state your
10 full name for the record.
11 A Dorothy Delisfort.
12 Q Could you spell your name, please.
13 A D-e-l-i-s-f-o-r-t.
14 MS. PAULOSE: Could we get counsel to
15 note appearances, please.
16 This is Rachel Paulose with the United
17 States Securities and Exchange Commission.
18 MR. PARKER: Buddy Parker on behalf
19 of Ms. Delisfort.
20 MS. VAN VLIET: Theresa Van Vliet
21 with the law firm of Genovese, Joblove &
22 Battista on behalf of the Receiver.
23 Good morning, Ms. Delisfort. Good
24 morning, Buddy.
25 MR. PARKER: Good morning, Theresa.

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1 THE WITNESS: Good morning.
2 MR. WEIGEL: Russell C. Weigel, III,
3 on behalf of George Theodule.
4 MS. VAN VLIET: Could I also ask that
5 Ms. Delisfort keep -- and Rachel, that you keep
6 your voices up or move the microphone closer to
7 you. It's kind of hard to hear.
8 MS. PAULOSE: I was just going to say
9 that, actually.
10 BY MS. PAULOSE:
11 Q Ms. Delisfort, have you had your
12 deposition taken before?
13 A Yes.
14 Q Okay. And I'm going to ask you to speak
15 up because you are very soft spoken, and even I have
16 trouble hearing you. So we want to make sure that
17 everybody hears you.
18 Are you known by any other names?
19 A My first married name, Crisostomo.
20 Q Okay. Could you spell that, please?
21 A C-r-i-s-o-s-t-o-m-o.
22 Q Any other names?
23 A No.
24 Q Okay. A few ground rules. You're under
25 oath to tell the whole truth just as if you were in

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1 court. Do you understand that?
2 A Yes.
3 Q And the court reporter is taking down your
4 testimony, so it's very important that you give
5 audible responses to my questions. Do you
6 understand that?
7 A Yes.
8 Q Okay. So if you nod your head, that's not
9 going to appear on the record. As long as you say
10 yes or no or give a full answer, that will appear on
11 the record. I may remind you of that if you forget
12 from time to time.
13 A All right.
14 Q If at any time you don't understand my
15 question, just let me know. I'll do my best to
16 rephrase it so we can keep this deposition moving.
17 Do you understand that?
18 A Yes.
19 Q But if you do answer a question, I'm going
20 to assume that you did understand it -- if you
21 answer a question, I'll assume you did answer it and
22 we'll proceed accordingly. Do you understand that?
23 A Yes.
24 Q If you need a break, let me know.
25 Similarly, if you would like to consult with your

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1 counsel, let me know. You may hear counsel object
2 from time to time. Let counsel make their objection
3 for the record, but then you are required to answer
4 the question unless your counsel directs you not to
5 answer the question. Do you understand that?
6 A Yes.
7 Q Okay. Ms. Delisfort, are you on any
8 medication that would impact your memory or ability
9 to testify truthfully this morning?
10 A No.
11 Q Where do you presently live?
12 A Snellville.
13 Q Could you give the full address, please?
14 A 2108 New London Place, Snellville, Georgia
15 30078.
16 Q Okay. Another thing I'm going to ask is
17 let me finish my question before you start answering
18 so we have a clean record here.
19 A Okay.
20 Q What's your date of birth?
21 A February 26, 1974.
22 Q And your Social Security number?
23 A 589-34-5509.
24 Q What is your e-mail address?
25 A Nialana@hotmail.com.

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1 Q How do you spell that?
2 A N-i-a-l-a-n-a.
3 Q At hotmail.com?
4 A Yes.
5 Q Do you use any other e-mail addresses?
6 A Nialana1@gmail.com.
7 Q And how do you spell that?
8 A N-i-a-l-a-n-a-1@gmail.com.
9 Q Any others?
10 A No.
11 Q How about wealthbuilderscircle@gmail.com?
12 A No. I used to use that one when the
13 office was operating, not any longer.
14 Q When did you use that e-mail address? And
15 by "that," I mean wealthbuilderscircle@gmail.com.
16 A I cannot recall.
17 Q Do you have a general time frame?
18 A No.
19 Q Was it while you were president of Wealth
20 Builders Circle?
21 A Probably.
22 Q Okay. Well, it certainly wouldn't have
23 been before you were affiliated with Wealth Builders
24 Circle, would it?
25 A No.

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1 Q Okay. So it was during the time period
2 that you were affiliated with Wealth Builders
3 Circle, correct?
4 A Probably, yes.
5 Q Okay. What other addresses have you lived
6 in during the past -- over the past three years?
7 A I cannot remember, but if you -- I think
8 there is a document they sent that had all my
9 addresses on there. It came from you guys.
10 Q 2108 New London Place, Snellville, Georgia
11 30078, is that a residence?
12 A Yes.
13 Q A former residence of yours?
14 A That's the one I just gave you, yes.
15 Q Okay. And you're presently living there?
16 A Yes.
17 Q How about 3575 Koger Boulevard, Suite 180,
18 Duluth, Georgia 30096?
19 A That's not my residence.
20 Q Did you ever live there?
21 A No.
22 Q What is there?
23 A That was the office for Wealth Builders
24 Circle.
25 Q So did you work at that office?

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1 A Yes.
2 Q Okay. And what time period did you work
3 at that office?
4 A I think we signed the lease in March. I'm
5 not sure.
6 Q Who signed the lease?
7 A I believe myself and Edwige Benoit.
8 Q March what year?
9 A 2008.
10 Q And who is this person that you just
11 referred to?
12 A He was the vice president and acting
13 president of the office.
14 Q Pardon me. His full name?
15 A Edwige Benoit.
16 Q And could you spell that?
17 A I think it's E-d-w-i-g-e B-e-n --
18 B-e-n-o-i-t.
19 Q And while you were working at that office,
20 did you receive communications at that office?
21 A Like what?
22 Q E-mail, mail, phone calls.
23 A Yes.
24 Q All three?
25 A That's how -- yeah.

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1 Q Yes. Okay. Ms. Delisfort, are you
2 presently employed?
3 A Yes.
4 Q What do you do?
5 A I'm a nurse.
6 Q And where do you work?
7 A Piedmont Hospital.
8 Q I'm not from here. Where is Piedmont
9 Hospital?
10 A It's in Atlanta.
11 Q In Atlanta, Georgia?
12 A Uh-huh.
13 Q Okay. And you're an RN; is that correct?
14 A Yes.
15 Q Okay. Could you tell me about your
16 educational background?
17 A From high school?
18 Q After high school.
19 A Okay. I went to -- during high school I
20 was enrolled in the LPN program and --
21 Q Pardon me. What's the LPN program?
22 A It's a licensed practical nurse.
23 Q Thank you.
24 A But before that I did unit secretary and
25 nursing assistant for a year after high school. And

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1 then I completed the LPN program. And while I was
2 doing the LPN program, I was taking classes towards
3 my registered nursing. And then I went to Broward
4 Community College for registered nurse. And then --
5 Q I'm going to interrupt you for a second.
6 During what time period are we talking now?
7 A I can't remember.
8 Q Give me a general time frame.
9 A I know I graduated in '94.
10 Q From high school?
11 A No. In '90 from high school.
12 Q Okay.
13 A And LPN I think in '92. I can't recall,
14 really. And after my AS degree, I went to Mercer
15 University for my Bachelor's.
16 Q And when did you graduate with your
17 Bachelor's? Did you graduate with a Bachelor's?
18 A Yes.
19 Q And when did you graduate with a
20 Bachelor's?
21 A Maybe 2004, 2003. I can't remember.
22 Q Okay. Any training beyond that?
23 A I applied for law school and was accepted,
24 but I couldn't go.
25 Q Where were you accepted?

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1 A John Marshall.
2 Q And why did you decide not to go?
3 A Because this opportunity came available
4 with CCC and I felt that I could probably do that
5 for now -- for that time.
6 Q Okay. Tell me about your background in
7 finance and investment, if any.
8 A None.
9 Q Ms. Delisfort, other than your attorney,
10 did you speak to anybody about your deposition today
11 or the documents requested?
12 A No.
13 Q Okay. I put in front of you what we'll
14 mark as Exhibit 45 in this case. That's our Notice
15 of Taking Deposition along with the subpoena that we
16 sent you. Are you testifying pursuant to that
17 subpoena this morning?
18 A Yes.
19 (Exhibit No. 45 was marked for
20 identification.)
21 BY MS. PAULOSE:
22 Q Okay. The subpoena also requests
23 documents. Did you conduct any kind of search to
24 find the documents requested in the subpoena?
25 A I did. And whatever I had in the past, I

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1 gave them to Mr. Parker.
2 Q Okay.
3 A And I think he submitted them to you.
4 Q Did you look on your computer for
5 documents?
6 A I did when I had my first deposition. And
7 I forwarded what was pertinent to Mr. Parker.
8 Q Okay. When you say "first deposition,"
9 you mean with the Receiver?
10 A This is my third deposition, so I don't
11 know who is the Receiver or who is SEC. I don't
12 know.
13 (Exhibit No. 46 was marked for
14 identification.)
15 BY MS. PAULOSE:
16 Q Okay. Well, let's turn to what we'll mark
17 as Exhibit 46 in this case. This is a cover letter
18 from your counsel, Mr. Parker, along with two
19 charts. Do you recognize these documents,
20 Ms. Delisfort?
21 A Yes.
22 Q Okay. What are they? Let's start with
23 the first chart that says "GT Holdings, Inc. (Sole
24 Proprietor)." And it's Bates stamped
25 Delisfort-00027.

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1 A I cannot -- I know who sent it to me, but
2 I'm not the one who put it together. There was
3 several people trying to put some order and
4 organization into the systems. And I think Helen
5 was the one who sent this to me.
6 Q Helen who?
7 A Helen Seiz.
8 Q How do you spell her last name?
9 A S-e-i-z.
10 Q When did she send this to you?
11 A Last year sometime.
12 Q Why did she send the document to you?
13 A There was several people working on
14 putting some order, some organization into the way
15 that CCC was running. Many people were not happy
16 about the misorganization because some of the
17 others, they were not responding to the people when
18 they would call, or they would be on vacation or
19 things like that.
20 Q Why was this document sent to you, Dorothy
21 Delisfort?
22 A Because I was one of the people who was
23 trying to put some order along with the people in
24 the groups.
25 Q Did you have any affiliation with any of

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1 these entities noted on this first chart, GT
2 Holdings, Inc., The MANNA Group, Divine Alliance, G2
3 Brokerage Firm, or other companies?
4 A The MANNA Group was one of the groups we
5 were trying to put here in Georgia, because the
6 people didn't want to have anything to do with
7 Florida because of the misorganization.
8 Q Did you -- were you successful in putting
9 The MANNA Group together?
10 A No.
11 Q Let's go to the next page. What's this
12 document? It's Bates stamped Delisfort-00028.
13 A That was similar to this one. If the
14 MANNA came -- became successful, this was going to
15 be a chart that we could use for it.
16 Q So this was the plan for the organization
17 of The MANNA Group, correct?
18 A Yes, because people didn't want to have --
19 it was really misorganized.
20 Q And the plan was for you to be the CEO of
21 The MANNA Group?
22 A Yes.
23 Q And the plan was for the CIO to be Mario
24 Theodule?
25 A Yes.

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1 Q Who is Mario Theodule?
2 A He is George's brother.
3 Q George being your husband?
4 A Yes.
5 Q And your husband, George Theodule, is
6 listed as the acting chief financial officer; is
7 that correct?
8 A Yes. But they're not the ones that put
9 this together. This was just something Helen put
10 together so we could see where she -- where she felt
11 people would be placed.
12 Q Did you have any input into creating this
13 document or editing it?
14 A I didn't edit it. We talked about it
15 maybe sometime on how -- which people -- she had
16 some people, she just put them in, but it wasn't a
17 definite.
18 Q But you were open to the idea of being the
19 CEO?
20 A No, I wasn't.
21 Q So when you got this document, what did
22 you do when you saw that you were listed as the CEO?
23 A We had plans to discuss them and to review
24 and to put them in place, but we never had a chance
25 to.

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1 Q Did you tell anyone, "I don't want to be
2 the CEO of this --"
3 A I told --
4 Q Let me finish my question.
5 Did you tell anyone, "I don't want to be
6 the CEO of this organization"?
7 A I spoke with Helen when she created
8 this --
9 Q Ms. Delisfort -- excuse me -- I'm asking
10 you did you tell anyone, "No, I don't want to be the
11 CEO"?
12 A That's what I'm trying to answer you.
13 Q It's a simple question. Yes or no?
14 A Well, I spoke with Helen when she
15 developed this and she sent it to me. I told her,
16 you know, I don't want to be represented as CEO of
17 the company. I think maybe either George or some of
18 these other people should be because they have more
19 knowledge about financing.
20 And she said, well, when we meet together,
21 we can go over it and see where you would be best
22 placed. But we never had a chance to redo it.
23 Q Who is Houston Delisfort?
24 A That's my brother.
25 Q Who's Julius Theodule Anderson?

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1 A Who?
2 Q Julius Theodule Anderson listed under
3 training and certification.
4 A Julius is George's son.
5 Q How about Gilberte Delisfort?
6 A That's my sister-in-law.
7 Q Okay. Let's back up for a second. How
8 did you first meet George Theodule?
9 A Can I ask questions, too, or I'm not
10 allowed?
11 Q No.
12 A Okay. I met George in Florida.
13 Q And when was that?
14 A Either the 28th or the 29th of December
15 2007.
16 Q And how did you meet him? Where was this
17 meeting?
18 A It was in West Palm Beach.
19 Q And what was happening at West Palm Beach
20 such that you met George Theodule?
21 A I have a friend that wanted the two of us
22 to open an ALF, assisted living facility. And I had
23 money to open the company and he was going to -- we
24 both were going to run it, assisted living.
25 And he told me -- along the course I was

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1 looking for the house. I had already gotten the
2 book from the state to know how to put this in
3 place. And he was supposed to do the financing and
4 the business aspect of it and I was supposed to do
5 the nursing aspect.
6 Q "He" being George Theodule?
7 A No.
8 Q Your friend?
9 A My friend. And -- Shelley Lozier is his
10 name.
11 And then along while we were trying to put
12 that together, he called me and he said that there's
13 an opportunity that he's heard about. And he thinks
14 that it would be better if we can put my money in
15 that company and then probably later on be able to
16 have a bigger -- maybe a nursing home or something
17 instead of an ALF.
18 So I told him I really wanted to do the
19 ALF. But then he continued to call me and say, you
20 know, I think this might be better. And so I got
21 some information on the company, which was CCC. And
22 I called around a few people that were -- that I
23 still knew in Florida, and they said it would be --
24 it could be something that I could go into. And so
25 he called me. When we spoke --

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1 Q Who is "he"?
2 A Shelley, Shelley Lozier.
3 And so after we talked about it, he said I
4 should come down to meet or to see the company
5 first. And so I flew there and they had a meeting.
6 Magda Dominique had a meeting, and I went to it.
7 And after the meeting is when I met George.
8 Q George was present at the meeting?
9 A No.
10 Q This meeting was at the Lake Worth office,
11 correct?
12 A Yes.
13 Q Okay. And, by the way, does George live
14 with you presently?
15 A Yes.
16 Q And what's his -- what's his e-mail
17 address?
18 A I don't know which e-mail address he uses.
19 Q Have you ever e-mailed him?
20 A I probably have.
21 Q Have you heard of his e-mail
22 georgetheodule@yahoo.com?
23 A Yes.
24 Q That is one of his e-mails?
25 A Yes.

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1 Q Any others?
2 A I don't know.
3 Q Okay. So Magda Dominique made a
4 presentation for CCC at the Lake Worth office in
5 December of 2007, correct?
6 A Yes.
7 Q And you were looking for financing for a
8 company at about this time, correct?
9 A Not really financing, because I had the
10 money. But Shelley said we could make more money
11 with my money that I had. So he said that would be
12 a good thing to go into.
13 Q And Magda made a presentation on
14 investments in CCC, correct?
15 A Yes.
16 Q She talked about how you could double your
17 money in 90 days, correct?
18 A She said the company had been doing that
19 and there's a potential that we could get more money
20 from our money.
21 Q And she specifically said you could double
22 your money in 90 days, correct?
23 A I cannot really recall if she said that or
24 not.
25 Q Did you give prior testimony to the

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1 Receiver in this matter, Ms. Dominique?
2 A Yes.
3 Q I'm sorry, Ms. Delisfort.
4 A Yes, I did.
5 Q And were you under oath at the time you
6 gave that testimony?
7 A Yes, I was.
8 Q Did you -- you were under oath to tell the
9 full truth, correct?
10 A Yes.
11 Q Did you tell the full truth?
12 A Yes.
13 Q We'll get back to that in a minute. But
14 Magda Dominique -- I don't have a copy of that. I
15 don't have an extra copy, so I'm going to work off
16 mine.
17 Ms. Delisfort, you spoke to the Receiver
18 on February 9th, 2009; is that correct?
19 A If you've got it documented, I guess
20 you're right. I don't have anything to refresh me.
21 MS. PAULOSE: Let's mark this
22 Exhibit 47. I'll have to get you a copy later,
23 Madam Court Reporter.
24 BY MS. PAULOSE:
25 Q But do you see this document here, it

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1 says, Deposition of Dorothy Delisfort, February 9,
2 2009, 18 Capitol Square, Atlanta Georgia? Did I
3 read that accurately?
4 A Yes.
5 Q And is that your name, Dorothy Delisfort?
6 A Yes, ma'am.
7 Q And does this appear to be a transcription
8 of your testimony that you gave to the Receiver on
9 that day?
10 A I can look at it to see.
11 Q Sure.
12 A Yes.
13 Q Okay. One of the things the Receiver
14 asked you about was whether -- was the nature of the
15 presentation of Ms. Dominique, correct?
16 A I'm sorry?
17 Q One of the things the Receiver asked you
18 about was the presentation that you were just
19 describing to me, correct?
20 A Yes.
21 Q Okay. And I'm going to read to you on
22 page 13 starting at line 9. Actually, let's start
23 at line 5. It says, "Question: The presentation
24 that you attended at the office in Lake Worth, was
25 that CCC's office, Creative Capital's office?"

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1 "Answer: I don't know.
2 "Question: Okay. Who was present at that
3 presentation aside from Magda Dominique, George
4 Theodule, yourself, and your friend, Mr. Shelley?"
5 Did I read that accurately?
6 A Yes. What did I answer?
7 Q You answered, "Windsor Jean-Charles,
8 Windsor --" and then you spelled it "-- and Astrid,
9 I don't know her last name. But they were the ones
10 that I was staying with."
11 Was that accurate testimony that you gave?
12 A Yes.
13 Q Okay. Now I'm going to start reading
14 again at page 16, line 15. "Let me see if --" this
15 is question by Ms. Van Vliet. "Let me see if I can
16 refresh your memory a little bit. Does the notion
17 of doubling your money in 90 days ring a bell?
18 "Answer: Yes and no. She did mention
19 that it had the potential of doubling money and that
20 the company had been doing that and that they were
21 successful at it."
22 Did I read that correctly?
23 A Yes.
24 Q And then again on line 18 at page 17.
25 "Question: She's writing me something

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1 that she wants me to ask you but -- you mentioned
2 when they were talking about, you know, that
3 potentially they could double your money in 90 days
4 that they had said that they had done that before;
5 is that right?
6 "Answer: Yes."
7 Did I read that accurately?
8 A Uh-huh.
9 Q And, again, were your answers at the time
10 that you made under oath to the Receiver truthful,
11 Ms. Delisfort?
12 A Yes.
13 Q Does that refresh your recollection on
14 what was said by Ms. Dominique at that meeting?
15 A Yes.
16 Q Okay. And was your answer previously that
17 she had mentioned that they had been successful at
18 doubling people's money in 90 days accurate?
19 A She -- I'm sorry. Go ahead.
20 Q No. I finished.
21 A She said they had the potential, yes.
22 Q Okay. And you also testified about what
23 you did in response to this presentation, correct?
24 A Yes.
25 Q In fact, you invested some money in the

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1 company after this, didn't you?
2 A Yes.
3 Q You invested \$20,000 to CCC, correct?
4 A Yes.
5 Q And, eventually, that money was
6 transferred to Wealth Builders when you became
7 president, correct?
8 A Yes.
9 Q Did you make any money off that \$20,000?
10 A No.
11 Q Did you lose all the money?
12 A Yes.
13 Q Or did CCC lose all the money?
14 A Yes. Actually, I don't know -- I didn't
15 make any withdrawal requests. That's what I
16 answered her. I never requested for my money.
17 Q But you never got anything back; is that
18 accurate?
19 A Yes.
20 Q Now, Ms. Delisfort, you did come to hold a
21 position with CCC and with Wealth Builders in
22 particular, correct?
23 A Never with CCC.
24 Q Did you hold a position with Wealth
25 Builders?

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1 A Yes.
2 Q And that was an investment club of CCC?
3 A No.
4 Q Did you invest money in CCC through Wealth
5 Builders?
6 A Yes.
7 Q Did you invest in anything besides CCC
8 through Wealth Builders?
9 A We were trying to --
10 Q Did you invest any money in any entity
11 besides CCC with Wealth Builders?
12 A We were trying to do that, and at the --
13 around probably September or October, everything
14 fell through. Nothing worked. But we were trying
15 to put insurance --
16 MS. PAULOSE: Counsel -- let the
17 record reflect that Mr. Parker is directing the
18 witness to some notes he has written.
19 THE WITNESS: I found another check I
20 had written to WBC for an investment. And I
21 brought the copy with me.
22 BY MS. PAULOSE:
23 Q But the question, Ms. Delisfort, is, did
24 you invest any Wealth Builders money with any entity
25 other than CCC? Not what you were trying to do, not

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1 what you were thinking about doing, not what you
2 hoped to do. Did you do it?
3 A Edwige would have to tell us if he did or
4 not.
5 Q Do you know if you did?
6 A I think we were -- there was several
7 things we were doing. I don't know which one they
8 did or they didn't do.
9 Q As you sit here today, can you truthfully
10 tell me under oath that you know that one penny of
11 Wealth Builders Circle money went to any entity
12 besides CCC? Can you say that under oath?
13 A I can truthfully tell you that we have
14 tried --
15 Q No, no, no. I'm not asking what you tried
16 to do, not what you attempted to do. I'm asking
17 what you did, Ms. Delisfort. Do you understand the
18 question?
19 A I hear the question.
20 Q Okay. Answer the question.
21 A My truthful answer to you is Edwige,
22 myself, and people -- other people that were in the
23 office -- there were a lot of other businesses that
24 were coming through to the office. So I'm not sure
25 if we ever signed anything or if we ever invested

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1 anything.
2 Q I'm not asking you to answer the converse.
3 I don't want to know what you're not sure of. I
4 don't want to know what you thought about doing. I
5 want to know what you are sure of.
6 Are you sure you gave one penny to any
7 entity other than CCC? Do you know as you sit here
8 today? That's the question, Ms. Delisfort.
9 A I don't know.
10 MR. WEIGEL: Asked and answered.
11 BY MS. PAULOSE:
12 Q You need to answer the question.
13 A I don't know if we ever finalized anything
14 with any of the people that were coming.
15 Q So the answer is no?
16 A I don't know, ma'am. If you want the
17 honest answer, that's the honest answer. I can't
18 lie and say yes or no.
19 Q Well, I certainly don't want you to lie.
20 Okay. Now, what position did you take at
21 Wealth Builders Circle?
22 A Can I submit this to you now?
23 Q Did you give this alleged check to anyone
24 at any time before this date?
25 A I spoke to Mr. Parker about it. He said

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1 to make a copy and bring it with me.
2 Q So in response to our subpoena you did
3 nothing with this alleged check until this day; is
4 that accurate?
5 A This is the day for me to produce it,
6 right?
7 Q Actually, no. The date for production was
8 many weeks ago, Ms. Delisfort.
9 A When I spoke with Mr. Parker, he said make
10 a copy and bring it with me. That's what he advised
11 me to do.
12 Q Well, you can certainly make a copy
13 afterwards, but you did not comply with the
14 requirements of the subpoena.
15 Now, what was your position with Wealth
16 Builders Circle?
17 A I was voted in as president.
18 Q And who voted you in?
19 A Jean Pierre Baptiste, Jerry Sinan, Edwige
20 Benoit, Stacy Fortunat. Those were the people --
21 Q Why did they vote you in as the president
22 of Wealth Builders Circle?
23 A Because I was the first person that went
24 to this meeting from -- in Florida. And when I came
25 back, I spoke with Edwige and I told him -- because

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1 he had helped me in the past with business ventures,
2 and I've taken advices from him that worked for me.
3 And when I brought the idea to him, I told
4 him I wasn't sure if I should invest in this
5 business that Shelley had told me. And he said he
6 would do all the legwork for me to see if it's
7 something that sounded right.
8 And he said he went through all the
9 things, Better Business Bureau and other companies,
10 and he didn't see anything wrong.
11 Q Why were you the president if other people
12 were telling you what to do?
13 A Because they felt because I was the first
14 one to have invested that I should be president.
15 Q I see.
16 A But not because I was any more
17 knowledgeable than they were.
18 Q I see. Did you draw a salary as president
19 of Wealth Builders Circle?
20 A Yes.
21 Q How much?
22 A I can't recall the full amount. The last
23 time they asked me, she said take a guess. I
24 guessed 40,000. But I cannot really say for sure
25 how much it was.

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1 Q And you were the sole signatory on the
2 Bank of North Georgia account as the president of
3 Wealth Builders Circle, correct?
4 A In October, I think, yes, when we opened
5 it, October 2008.
6 Q Okay.
7 A Or somewhere around that time.
8 (Exhibit No. 48 was marked for
9 identification.)
10 BY MS. PAULOSE:
11 Q So I'm putting in front of you,
12 Ms. Delisfort, what we'll mark as Exhibit 48 in this
13 case. This is a State of Georgia Secretary of State
14 record for Wealth Builders Circle Limited Liability
15 Company. Do you recognize this document?
16 A Yes.
17 Q What is it, ma'am? How do you recognize
18 it, I should say?
19 A I've seen this on my deposition on the
20 things Ms. Van Vliet, I think, showed to me one
21 time.
22 Q If you turn to the last page, it says
23 "Articles of Organization for Georgia Limited
24 Liability Company." It says the registered agent is
25 Dorothy D. -- I'm sorry. I'm not sure how to

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1 pronounce this -- C-r-i-s-o-s-t-o-m-o at 2108 New
2 London Place, Snellville, Georgia 30043. Did I read
3 that accurately?
4 A You read it accurately.
5 Q Was your name ever Dorothy D. Crisostomo?
6 A Yes.
7 Q Okay. How do you pronounce that?
8 A You did it right.
9 Q Okay. And you lived at this address
10 that's described under your name?
11 A It's incorrect, but, yes.
12 Q Why is it incorrect?
13 A The ZIP code is not right.
14 Q What's the ZIP code? What's the correct
15 ZIP code?
16 A It's 30078.
17 Q Okay. Did you have anything to do with
18 putting this document together?
19 A Yes and no. Edwige is the one that did
20 it, but I knew he was going to do it.
21 Q Okay. Let's go to what we'll mark as
22 Exhibit 49 in this case.
23 (Exhibit No. 49 was marked for
24 identification.)
25 BY MS. PAULOSE:

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1 Q Exhibit 49, Ms. Delisfort, is a Georgia
2 Secretary of State -- another record for Wealth
3 Builders Circle Limited Liability Company. Did I
4 read that accurately?
5 A Yes.
6 Q Who's listed -- and how would you describe
7 this document? Have you seen it before?
8 A First time.
9 Q Okay. Do you see your name on the second
10 page of this document, Ms. Delisfort?
11 A Yes.
12 Q And is the address that's listed there an
13 address -- the business address for Wealth Builders
14 Circle?
15 A Yes.
16 Q Okay. Ms. Delisfort, did you have direct
17 contact with investors in your capacity as president
18 of Wealth Builders Circle?
19 A Well, it was mainly word of mouth. So
20 people would come to us or ask us questions, come to
21 the office. Some would call us.
22 Q So the answer is, yes, you did communicate
23 with investors?
24 A Yes.
25 Q Okay. And what did you tell investors

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1 about investing in CCC?
2 A I really never had to say much. People
3 would ask me what do I do or if it's on the outside.
4 And I tell them there is a company that I'm working
5 with that's investing with another company, to bring
6 us some funds.
7 Q Who told you how to describe CCC to the
8 investors?
9 A There was a group called SIMS that came
10 and got the club certified. They didn't tell us per
11 se what to say about CCC. They told us what not to
12 say to investors and things that could be of issue.
13 Q And who was the head of SIMS?
14 A I think Kathryn Parker.
15 Q Okay. Were you ever given any documents
16 in connection with your work at CCC -- at Wealth
17 Builders Circle?
18 A Say that again, please.
19 MR. WEIGEL: Objection. Vague.
20 BY MS. PAULOSE:
21 Q Were you ever given any documents
22 describing the background of CCC in your capacity
23 with Wealth Builders Circle?
24 A There was a booklet they gave us about
25 SIMS and how we were to do the office, but not

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1 really about CCC.
2 Q You communicated with people like Magda
3 Dominique regarding people who were investing, how
4 much they were giving, those sorts of details,
5 correct?
6 A Not really.
7 Q I'm putting in front of you,
8 Ms. Delisfort, what we'll mark as Exhibit 50 in this
9 case. It may have been previously marked as well.
10 (Exhibit No. 50 was marked for
11 identification.)
12 BY MS. PAULOSE:
13 Q Now, you told me earlier that one of the
14 addresses at which you received e-mails was
15 wealthbuilderscircle@gmail.com, correct?
16 A Yes.
17 Q And do you see this Exhibit --
18 A Let me make a correction to the Wealth --
19 Q There's no question pending,
20 Ms. Delisfort.
21 A I'm not asking a question. I said let me
22 make an addendum to what I said about the
23 wealthbuilderscircle@gmail. That wasn't my personal
24 e-mail. That was the office e-mail. So everybody
25 used that e-mail.

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1 Q This e-mail is from mdfrezin@aol.com to
2 wealthbuilderscircle@gmail.com, correct?
3 A Yes.
4 Q And it's dated August 4th, 2008, correct?
5 A Yes.
6 Q And the first line says, "Dorothy, here
7 are the uncomplete list. Magda," correct?
8 A Yes.
9 Q This e-mail went to you, correct?
10 A Yes.
11 Q And what does this e-mail depict?
12 A She sent this to me but for George,
13 because I think at that time George's e-mail was not
14 working. And she sent that to George because George
15 was supposed to send funds to these investors. But
16 that wasn't to me.
17 Q Who is the "she"?
18 A Magda.
19 Q Okay. And what did you do with this
20 information?
21 A I think I may have forwarded it to George
22 or make a copy, give it to George. I can't remember
23 what I did with it.
24 Q Did you personally take any action in
25 response to this e-mail?

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1 A I don't think so. I don't recall.
2 Q Okay. I'm putting in front of you what
3 we've previously marked in this case as -- I believe
4 it's Exhibit 11. It's an e-mail from Berthrum
5 Brewster, Friday, September 26th to Linda Schmidt.
6 It has attachments including investment club bylaws
7 and operating procedures, investment club general
8 partnership agreement, guidelines for compliance
9 with club rules, membership application, opening
10 checklist, deposit receipt, UPC welcome, your
11 invitation to financial freedom, script for club
12 presentations, and a withdrawal request. Did I read
13 that accurately?
14 A Yes, ma'am.
15 Q Okay. And it's been forwarded from
16 Kathryn Parker, who describes herself as training
17 manager, SIMS. Do you see that at the bottom of the
18 document?
19 A Yes.
20 Q Okay. If you turn to the second page of
21 this document, it says "Investment Club Bylaws and
22 Operating Procedures." Did I read that correctly?
23 A Yes.
24 Q Were you ever given a copy of this in your
25 capacity at Wealth Builders Circle?

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1 A When they came to do the certification of
2 the club, they gave us a folder. I think one of
3 these may have been in it.
4 Q So you have seen these documents before?
5 A I think so, yes.
6 Q Okay.
7 A And I think Ed made some changes to it.
8 Q Okay. If you'll turn in this document to
9 the first page 6, it says "Article VII, Officers'
10 Duties." And the first officer listed there is the
11 president. It describes the president as the legal
12 agent, lead negotiator, and signatory on all
13 transactions binding the club. It says "The
14 President shall be the primary signatory on all
15 checking accounts, banking instruments and as the
16 principal party or agent in purchasing, or selling
17 stocks, securities, options, as well as other
18 diversified investments, all as may designated by
19 the Club Membership." Did I read that accurately?
20 A Yes.
21 Q Did anyone talk to you about your role as
22 president in these specific responsibilities,
23 Ms. Delisfort?
24 A No.
25 Q Okay. Let's turn to page 10, please,

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1 Ms. Delisfort. And directing your attention to the
2 second bullet. It says, "The Club shall establish a
3 Code of Ethics." Do you see that?
4 A Yes.
5 Q Okay. Did anyone talk to you about
6 establishing a code of ethics for the club?
7 A No. But we did one for the club.
8 Q On your own initiative?
9 A Yes.
10 Q Not because anyone asked you to?
11 A No.
12 Q Okay. Let's turn three pages down,
13 Ms. Delisfort, where it says "Partnership
14 Agreement." Keep going. Do you see that?
15 A Yes.
16 Q Did you use any form of this document to
17 operate Wealth Builders Circle?
18 A I cannot say for sure, because when they
19 sent us this package, there was a lot of confusion
20 on it. And I don't think Ed was clear as to which
21 one to use for the -- for the investors or ones to
22 use for business ventures we would be involved in.
23 So I don't know if we used this one or if we used
24 the first one.
25 Q Okay. Club Guidelines for Compliance with

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1 Club Rules, can you keep turning until you get to
2 that section.
3 A Which page?
4 Q Keep going. I'll tell you when to stop.
5 There we go. Take a minute to look at this,
6 Ms. Delisfort.
7 Did anyone talk to you about the club
8 guidelines for compliance with club rules?
9 A Again, when Kathy and them came and did
10 the certification, they gave us this. She went over
11 some things. And I don't know if she went over this
12 or this one or this one. I can't really remember,
13 but all of this was in the package, and they said --
14 she said we needed to use this as a guide to how we
15 would run our own club.
16 Q Turning to the next page -- just one page
17 over. Do you see where it says under point number 1
18 "Theft of property, assets, services or money from
19 the Club," and point number 2 says "Fraud, including
20 but not limited to improper use of Club Name, Tax
21 Identification number, or assets of the Club for
22 purposes of self-dealing or gain"? Did anyone
23 explain to you what that meant?
24 A No.
25 Q Okay. Are you aware of whether anybody,

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1 including yourself, at Wealth Builders Circle
2 engaged in fraud or theft of funds?
3 A No.
4 Q Let's turn to -- you need a break?
5 MS. PAULOSE: Could we take a
6 five-minute break, please. We'll go off the
7 record.
8 (A recess was taken.)
9 BY MS. PAULOSE:
10 Q Okay. Ms. Delisfort, we were discussing
11 Exhibit 11. And I was just asking you to turn to
12 the page marked "Membership Application." Keep
13 turning.
14 A Yeah.
15 Q Right there. Do you see the page marked
16 "Membership Application"?
17 A Yes.
18 Q Did you ever give any form of this
19 document to any investors?
20 A Yes.
21 Q Let's turn a few pages down. There's a
22 slide that says "Your Invitation to Financial
23 Freedom." Keep going. And it says "Welcome to an
24 orientation by blank." Did I read that accurately?
25 A Yes.

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1 Q Did you ever give any orientations --
2 A No.
3 Q -- with CCC?
4 A No.
5 Q Okay.
6 A I have never seen this before.
7 Q Okay. Let's keep going another three
8 pages down. Keep going. Have you ever seen this
9 bar graph that says "Our past performance, return on
10 investment" before?
11 A No.
12 Q Okay. Did anyone ever talk to you about
13 this?
14 A No.
15 Q Okay. Do you know why the bar graph was
16 depicting investments as doubling in a quarter?
17 MR. WEIGEL: Objection.
18 BY MS. PAULOSE:
19 Q Go ahead and answer.
20 A I've never seen this before, ma'am.
21 Q So you don't know?
22 A No.
23 Q Let's go to what has previously been
24 marked in this case as Exhibit 9. Do you know what
25 Exhibit 9 is, Ms. Delisfort?

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1 A Is this what you just gave me?
2 Q Correct.
3 A First time I see this.
4 Q Okay. Do you see where it says "Creative
5 Capital Consortium Business Plan"?
6 A Yes.
7 Q Would you take a minute to just look
8 through this?
9 A Sure.
10 MS. PAULOSE: Maybe Mr. Parker can
11 give you his jacket.
12 THE WITNESS: No. I'm all right.
13 I'll be okay. Thank you.
14 MS. PAULOSE: If I could take mine
15 off, I would, but I can't.
16 THE WITNESS: Thank you. I
17 appreciate that.
18 MS. VAN VLIET: You're such a
19 gentleman, Buddy.
20 MR. PARKER: I'll be glad to give her
21 my jacket.
22 MS. PAULOSE: I had even offered mine
23 for the record, except that I'm not in a
24 position to offer it.
25 THE WITNESS: Thank you. Thank you.

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1 BY MS. PAULOSE:
2 Q Ms. Delisfort, do you recognize this
3 document?
4 A No.
5 Q Okay. I'm going to ask you to turn,
6 ma'am, three pages in. Keep going. I'm sorry.
7 Right here where it says "1.1 Objectives."
8 Objective number 4 says "To maintain and
9 grow the total income for subsequent years at a rate
10 of 50 to 60 percent annually."
11 In your capacity as president of Wealth
12 Builders Circle, did anyone ever talk to you about
13 that objective?
14 A I've never seen this before.
15 Q I'm not asking you about this particular
16 document. I'm asking you did anyone talk to you
17 about growing income at a rate of 50 to 60 percent
18 annually?
19 A No. Not me, no.
20 Q Okay. Next page, "2.1 Company Ownership."
21 It says, "George Louis Theodule is the President and
22 CEO of Creative Capital Consortium, LLC.
23 Mr. Theodule brings over 25 years --"
24 A I'm sorry. Where are you reading?
25 Q (Indicating.)

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1 A Okay. Thank you. I'm sorry.
2 Q "Mr. Theodule brings over 25 years
3 experience in the world of finance and sales." Did
4 I read that accurately?
5 A Yes.
6 Q Do you know if that is a true description
7 of Mr. Theodule's background?
8 A I don't know for sure. I just know that
9 they said he's been in business for over 17 years,
10 is what I heard. And he's been in finance for many
11 years and -- I don't know.
12 Q So you don't have direct knowledge of
13 this; is that correct?
14 A No, I don't.
15 Q Okay. So let's turn now -- I think it's
16 about nine pages from the end. Can I help you?
17 A Nine?
18 Q Yeah. If I may.
19 A Sure.
20 Q It's a slide that says, "Joining New
21 Members Continued." Do you see that last section
22 that says, "Third party Verification 877-355-SIMS"?
23 Did I read that accurately?
24 A Yes.
25 Q Okay. Did you describe SIMS to your

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1 investors in Wealth Builders Circle?
2 A Yes.
3 Q And how did you describe SIMS to them?
4 A What SIMS told us, if I recall --
5 Q Let me interrupt you for a second,
6 Ms. Delisfort. When you say "what SIMS told us,"
7 tell me specifically who you're talking about at
8 SIMS.
9 A Kathryn Parker.
10 Q Okay. Thank you. Go ahead. So what
11 Ms. Parker told you was?
12 A Well, she didn't tell it to me. We were
13 having a meeting of everybody that wanted to be
14 president or secretary or whatever.
15 Q She told this to you and others? Is that
16 what you're saying?
17 A Yes.
18 Q Okay.
19 A When they had the certification, it was
20 everybody that was going to be part of the Wealth
21 Builders Circle. And she said when somebody
22 invests, they need to call their number to verify
23 their funds. And that's what we told the people.
24 We said after -- if you choose to make a deposit
25 with us, call this number and tell them how much

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1 money you've invested.
2 Q Okay. What else did she say about SIMS?
3 A She said they were a totally independent
4 company and they weren't under the management of
5 CCC, from what I can recall. I can't recall
6 everything she said that day.
7 Q Is there anything else that you remember?
8 A I can't really recall. If you have a
9 question, I'll answer it to the best of my
10 knowledge. But she said we need to do our things
11 properly and get the right documents, things like
12 that, make sure we have an account and make sure
13 that we follow our bylaws, and that this we could
14 make amendments to. It's not a definite thing.
15 It's just a guideline.
16 Q Okay. You can put that aside.
17 Ms. Delisfort, did you ever open an
18 optionsXpress account?
19 A Yes.
20 Q Do you remember when you did that?
21 A No.
22 Q Why did you open the optionsXpress
23 account?
24 A George said he wanted to trade out of
25 different accounts and if I didn't mind having one

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1 opened. And I said, no, I didn't.
2 Q Did Mr. Theodule use your account to
3 trade?
4 A Yes.
5 Q I'm putting in front of you what we'll
6 mark as Exhibit 51.
7 (Exhibit No. 51 was marked for
8 identification.)
9 BY MS. PAULOSE:
10 Q Do you recognize Exhibit 51,
11 Ms. Delisfort?
12 A I never seen this, but, yes, I do.
13 Q Okay. Let's go to the second page of this
14 exhibit.
15 A Okay.
16 Q Is that your signature where it says
17 customer's signature?
18 A Yes.
19 Q And you dated it March 24, 2008?
20 A Yes.
21 Q And this e-mail that says
22 nialana1@gmail.com is one of the e-mails that you
23 previously testified you used?
24 A Yes.
25 Q This date of birth and Social Security

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1 number match up with the descriptions you testified
2 to earlier?
3 A Yes.
4 Q Okay. And on the third page of this
5 document, is that a copy of your Social Security
6 card?
7 A Yes.
8 Q Is the fourth page a copy of your United
9 States passport?
10 A Yes.
11 Q Is the fifth page a copy of your
12 naturalization certificate?
13 A Yes.
14 Q Is the last page a copy of your Georgia
15 driver's license?
16 A Yes.
17 Q Okay. Who had access to this account
18 besides you?
19 A Edwige and George.
20 Q Are you sure Mr. Edwige had access to
21 this --
22 A He's the one who opened it.
23 Q This particular account?
24 A Yes.
25 Q Did you have more than one account at

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1 optionsXpress?
2 A I think Edwige and I had one together.
3 Q Okay. Now, you received statements from
4 optionsXpress on a regular basis, true?
5 A No. I think they went to the office, and
6 Ed is the one that had them.
7 Q You previously testified that you showed
8 up at the office every day, correct?
9 A In the beginning, yes.
10 Q Were you giving an untruthful answer when
11 you told Ms. Van Vliet that you showed up at the
12 office every day to earn your paycheck?
13 A That's not an untrue statement. In the
14 beginning, we had to be there every single day. And
15 then as time passed by, I wasn't in the office as
16 much because I was traveling a lot.
17 Q I'm going to mark the next few exhibits as
18 a composite exhibit, Ms. Delisfort. I'm putting in
19 front of you what we'll mark as Exhibit 52.
20 (Exhibit No. 52 was marked for
21 identification.)
22 BY MS. PAULOSE:
23 Q These are optionsXpress account statements
24 for account number 0535-2869. Did I read that
25 accurately?

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1 A Yes.
2 Q And it's addressed to Dorothy Delisfort at
3 3575 Koger Boulevard, Suite 180, Duluth, Georgia
4 30096, correct?
5 A Yes.
6 Q And this first statement period covers a
7 period from April 1st, 2008 to April 30th, 2008,
8 correct?
9 A Yes.
10 Q And you previously testified that this
11 address was a business address for Wealth Builders
12 Circle of which you were the president, correct?
13 A Yes.
14 Q And this depicts a summary of account
15 activity; is that correct?
16 A Yes.
17 Q Okay. Let's turn to the next packet,
18 Ms. Delisfort.
19 A The next page?
20 Q The next packet. This is also an
21 optionsXpress account statement addressed to you,
22 Dorothy Delisfort, at 3575 Koger Boulevard,
23 Suite 180 in Duluth, Georgia; is that correct?
24 A Yes.
25 Q And this statement period covers May 1st

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1 to May 30th, 2008, correct?
2 A Yes.
3 Q Next statement, optionsXpress account
4 for -- is the optionsXpress account statement for
5 Dorothy Delisfort -- you -- from June 1st to
6 June 30th, 2008; is that correct?
7 A Yes.
8 Q The next statement is your account
9 statement from optionsXpress for July 1st to
10 July 31st, 2008; is that correct?
11 A Yes.
12 Q Next statement is your optionsXpress
13 account statement for August 1st, 2008 to August 29,
14 2008; is that correct?
15 A Yes.
16 Q Next statement is your optionsXpress
17 account statement for September 1st, 2008 to
18 September 30th, 2008, correct?
19 A Yes.
20 Q The next statement is your optionsXpress
21 account statement from October 1st, 2008 to
22 October 31st, 2008, correct?
23 A Yes.
24 Q Next statement is November 1st, 2008 to
25 November 28th, 2008, again, your optionsXpress

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1 account activity summary; is that correct?
2 A Yes.
3 Q Ms. Delisfort, all of these account
4 statements cover activity in an optionsXpress
5 account for you from basically April through the end
6 of November 2008? Is that a fair summary?
7 A Yes.
8 Q Okay. And these statements were going to
9 your business address in Duluth, Georgia, correct?
10 A Yes.
11 Q Okay. And the money that was going into
12 these optionsXpress accounts was money from CCC,
13 correct?
14 A I don't know, but I know that George is
15 the one that put the money in there.
16 Q Did you personally put any money in any of
17 these accounts, Ms. Delisfort?
18 A No.
19 Q Let's go to what we will mark as
20 Exhibit 53.
21 (Exhibit No. 53 was marked for
22 identification.)
23 BY MS. PAULOSE:
24 Q This is also a composite exhibit,
25 Ms. Delisfort. Ms. Delisfort, I realize this is a

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1 voluminous exhibit. These are optionsXpress order
2 numbers. Do you see in the top left-hand corner it
3 says order number and then it has again your name
4 and the Wealth Builders Circle business address? Do
5 you see that?
6 A Yes.
7 Q Okay. And do you see that this has
8 descriptions of account activity starting with a
9 settlement date on this very first page says
10 December 31st, 2008; is that correct?
11 A Yes.
12 Q And if you'll look at the very last page
13 of this document. The last page has order number
14 52433968, and the settlement date is April 8th,
15 2008. Is that accurate?
16 A Yes.
17 Q I think we've got this in reverse
18 chronological order. So the first date is last and
19 the last first.
20 Take a minute, if you would,
21 Ms. Delisfort, to look through these. Tell me if it
22 is your name and the 3575 Koger Boulevard address on
23 these documents.
24 A Yes.
25 Q Okay. So the answer is yes?

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1 A Yes.
2 Q Ms. Delisfort, did you personally engage
3 in any of these trades or account activity in the
4 optionsXpress account?
5 A No.
6 Q Do you know who did?
7 A I know George had a group of people that
8 were doing the tradings. I don't know if it's him
9 personally or them together. I'm not sure.
10 Q Do you know where any of this money went?
11 A No.
12 Q Now, you mentioned earlier, Ms. Delisfort,
13 that you also had an account with Edwige Benoit, is
14 how I would say it in French. Is that how you
15 pronounce it?
16 A Yes.
17 Q I'm putting in front of you what we'll
18 mark as Exhibit 54. Take a minute, if you would,
19 please, to look that over.
20 (Exhibit No. 54 was marked for
21 identification.)
22 BY MS. PAULOSE:
23 Q Do you recognize Exhibit 54?
24 A I never went to any of the accounts, so --
25 Edwige is the one who opened both accounts.

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1 Q Is this your name on this joint account
2 application?
3 A That's my name.
4 Q Okay. And if you -- if you compare this
5 with -- pardon me -- what I previously showed you as
6 Exhibit 51 -- this one is a joint account
7 application, correct?
8 A Yes.
9 Q And this -- 51 says individual account
10 application at the top, correct?
11 A Yes.
12 Q And you're the only person listed on
13 Exhibit 51, correct?
14 A Yes.
15 Q But on this current exhibit, 54, there are
16 two individuals listed, correct?
17 A Yes.
18 Q And this also lists your address and your
19 date of birth and your Social Security number. Are
20 those all accurate?
21 A Yes.
22 Q Okay. And who is listed as the
23 co-applicant on this account?
24 A Edwige Benoit.
25 Q Okay. And if you'll turn to the second

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1 page. Is that your signature?
2 A No.
3 Q Did you sign this document, Ms. Delisfort?
4 A No.
5 Q Do you know who did?
6 A Looks like Edwige's signature.
7 Q Were you aware that this joint account was
8 being opened?
9 A He told me he was going to open one. And
10 then when I received one statement, I realized that
11 he did.
12 Q What's your relationship with Mr. Benoit?
13 A We're just friends.
14 Q Okay. Now, do you see on the third page
15 of this document?
16 A Yes.
17 Q What is that?
18 A That's my license.
19 Q Your license and Mr. Benoit's together,
20 correct?
21 A Yes.
22 Q How did Mr. Benoit get your license?
23 A He has all my documents. He's had them
24 from when he did mortgages for me and when he did
25 other things for me.

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1 Q Does he have your original driver's
2 license?
3 A He has a copy in his computer.
4 Q Does he have your original?
5 A Yes. He has a copy in his --
6 Q No. I'm asking you your original card.
7 Does he have that?
8 A Not the card, no. But if you print it
9 on line -- it's a copier -- it's a copy that he has
10 of my license in his laptop, or his computer. So if
11 he prints it, it will look like the original.
12 Q Now, Ms. Delisfort, when was this account
13 opened?
14 A I don't know. I can look at it to see.
15 He signed it April 30th.
16 Q Okay. I'm handing you what we'll mark as
17 a composite Exhibit 55.
18 (Exhibit No. 55 was marked for
19 identification.)
20 BY MS. PAULOSE:
21 Q Ms. Delisfort, I've put in front of you
22 what we'll mark as Exhibit 55. This is -- these are
23 together optionsXpress account statements for
24 account number 0540-0635. Did I read that account
25 number accurately?

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1 A Yes.
2 Q And these are account activity summaries,
3 correct?
4 A Yes.
5 Q And the account activity summaries are
6 addressed to you and Edwige Benoit; is that correct?
7 A Yes.
8 Q And the address to which they go is 2108
9 New London Place, Snellville, Georgia, correct?
10 A Yes.
11 Q That is your current home address,
12 correct?
13 A Yes.
14 Q Okay. Now, does this first document --
15 the first account statement cover the period
16 May 1st, 2008 to May 30th, 2008?
17 A Yes.
18 Q And the second statement period for
19 account number 0540-0635 going to you at your home
20 address covers June 1st, 2008 through June 30th,
21 2008, correct?
22 A Yes.
23 Q And the next account statement going to
24 you at your home address is an account statement for
25 optionsXpress account number 0540-0635 from

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1 July 1st, 2008 through July 31st, 2008, correct?
2 A Yes.
3 Q And the next statement goes from
4 August 1st to August 29 of 2008, again, going to you
5 at your home address, correct?
6 A Yes.
7 Q The next statement also goes to you at
8 your home address. It's the optionsXpress account
9 statement from September 1st, 2008 to
10 September 30th, 2008, correct?
11 A Yes.
12 Q The next statement goes from
13 September 1st, 2008 -- I'm sorry. I think that may
14 be a repeat. September 1st -- no. September 1st,
15 2008 through September 30th, 2008, also going to you
16 at your home address, correct?
17 A Yes. But I only received one statement.
18 I never received all these statements.
19 Q Ms. Delisfort, do you know what was going
20 on with the money in this account over the time
21 period from May 1st, 2008 to September 30th, 2008?
22 A No.
23 Q Did you engage in any trades --
24 A No.
25 Q -- in that account?

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1 A No.
2 Q Do you know who did?
3 A I guess Ed. That was his account.
4 Q Did anyone -- it was also your account,
5 correct?
6 A It looks like it is, but it's not really
7 my account. He told me he was going to open one.
8 Until it was opened, that's when I realized that.
9 Q Did Mr. Theodule have access to this
10 account?
11 A I don't know.
12 (Exhibit No. 56 was marked for
13 identification.)
14 BY MS. PAULOSE:
15 Q Let's look at what we'll mark as
16 Exhibit 56 in this case. These are optionsXpress
17 individual order statements. And the first page,
18 ma'am, reads order number T104018578. Is that
19 correct?
20 A Yes.
21 Q Would you go to the last page. The order
22 number is 54205450, correct?
23 A Yes.
24 Q And, ma'am, this -- again, I think we're
25 in reverse chronological order. The last statement

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1 is May 14, 2008. It goes to August 17, 2008; is
2 that correct?
3 A Yes.
4 Q Okay. Did you make -- and, again, this is
5 addressed to you and Mr. Benoit at your home
6 address; is that correct?
7 A It looks like it.
8 Q Did you make any of these individual
9 orders?
10 A No.
11 Q Do you know what happened with any of this
12 money?
13 A No.
14 Q Did you open any accounts, Ms. Delisfort,
15 with Mr. Theodule with CCC money?
16 A I don't know, because there was one
17 account that I already had -- either I already had
18 or I opened with SunTrust. And George put money in
19 there, but I don't know if it's CCC's money or what
20 money.
21 Q Did you take any steps to find out?
22 A No.
23 Q And about what time period was this?
24 A I can't remember.
25 Q Was it before or after you were married to

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1 Mr. Theodule?
2 A That was before.
3 Q Okay. And, clearly, it was after you had
4 met Mr. Theodule in December of 2007; is that
5 correct?
6 A Yes.
7 Q Any other account where there was
8 potentially CCC money?
9 A I had an account with Washington --
10 myself, Washington Mutual and I had an account with
11 Wachovia. I've had those accounts. And I had an
12 account with Bank of America and my credit union
13 with Piedmont and with Associated Credit Union.
14 Those are all my accounts. And the one that George
15 was on was the SunTrust account.
16 Q Did he have access to any of the other
17 accounts?
18 A No.
19 Q You didn't authorize him access to any of
20 the other accounts; is that true?
21 A Well, I wouldn't say it that way, because
22 if I had my card on me while we were together, if
23 something needed to be spent, I would just let him
24 use it.
25 Q Ms. Delisfort, did you personally solicit

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1 investors for CCC?
2 A No.
3 Q Did you talk to investors about what CCC
4 could offer them?
5 A There were a lot of people who called --
6 like I said before, who called me, who came to see
7 me, who came even, some of them, to places that they
8 might think that I am. And they would ask
9 questions. And I tried to answer them to the best
10 of my knowledge.
11 But at not time did I force or pressure
12 anyone to get into the business. As a matter of
13 fact, we had people that came to the office and they
14 wanted to put in their 401(k)'s or --
15 Q Ms. Delisfort, it's important that you
16 answer the question that I ask.
17 A I'm trying to answer it so that I'm being
18 honest in what I say.
19 Q The question was, did you have personal
20 contact with investors. And I believe you answered
21 yes.
22 Okay. Let me ask you specifically about a
23 couple of investors. Did you personally solicit a
24 woman named Angela Telasco?
25 A Definitely not.

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1 Q Did you tell her that she could withdraw
2 her \$10,000 that she had put in her club,
3 Investopedia?
4 A Absolutely not.
5 Q Did you tell her she could invest that
6 money using new investors' funds?
7 A Absolutely not.
8 Q Did you tell Sam Innocent, who had
9 invested \$95,000 with CCC, that he should continue
10 investing with CCC?
11 A No.
12 Q Did you speak to him on December 5th,
13 2008?
14 A I can't recall who I spoke to. There were
15 a lot of people. After the business crumbled,
16 George didn't have a phone and everybody was calling
17 my phone. And I don't know if I specifically spoke
18 to him, but I never solicited anyone to continue or
19 to take part in businesses.
20 Q Actually, you told Mr. Innocent that he
21 should give CCC another \$50,000, didn't you?
22 A No.
23 Q You told him to invest with George
24 Theodule because George Theodule could double his
25 money in 90 days, true?

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1 A No.
2 Q You told Mr. Innocent Mr. Theodule had
3 doubled another investors' funds to \$300,000,
4 correct?
5 A No. Who is Mr. Innocent?
6 Q The question is did you say that?
7 A Well, I don't know who the person is, and
8 I don't recall having that conversation, so -- I
9 don't know who that is.
10 Q Did you personally solicit investors to
11 sign declarations for Mr. Theodule?
12 A I didn't solicit investors to. Many
13 people want to help George, and they offer their
14 help on how they can help him and support him.
15 And, again, a lot of people have called
16 me. A few have asked for me to send them whatever
17 documents there is that they can give in support of
18 him. And I've done that.
19 Q Did you send out a mass e-mail?
20 A No.
21 Q You've never sent an e-mail asking people
22 to sign declarations?
23 A Not a mass e-mail, no.
24 Q What kind of e-mail did you send?
25 A There were a couple of people who spoke to

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1 me. They told me to send them the affidavit via
2 e-mail. I sent maybe three or four. Maybe five.
3 Q Where did you get that affidavit from?
4 A George's attorney, I think, put it
5 together.
6 Q And who asked you to send it out?
7 A Maybe four or five people asked me to send
8 it to them. And most of it was -- I'd say 99.9
9 percent of it was handed in directly to the people.
10 And some of these people may have made copies and
11 sent them to their friends or people that they know
12 that, you know, George is probably honest in this
13 situation. So they called me and some of them asked
14 me -- maybe I sent a maximum of five, but not a mass
15 e-mail.
16 Q You asked people to say that George was an
17 honest man, didn't you?
18 A No.
19 Q You asked people to say -- to basically
20 clear his -- to clear him, didn't you?
21 A No. There are a lot of people asking how
22 they can help George because they know that George
23 is an honest person. And they know that George is
24 not at fault of fraudulent activities. And if
25 there's something that they can sign or something

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1 they can say -- some of them I tell them just go
2 straight to the attorney's office and give your
3 information. And some of them, I have given them
4 the attorney's phone number so that they can contact
5 the attorney directly.
6 Q Who is paying Mr. Theodule's legal bills?
7 A I was.
8 Q And where are you getting the money to do
9 that?
10 A My credit cards.
11 Q Any of those credit cards business credit
12 cards?
13 A One of them.
14 Q Which one?
15 A The AirTran.
16 Q And which business is AirTran affiliated
17 with?
18 A With Wealth Builders Circle.
19 Q And --
20 A But it's not -- it's -- when I was flying
21 one time to -- at the airport they asked me if I had
22 a business to have a credit card under. I said,
23 yes, I was the president of one of the businesses.
24 And they said I could open the account
25 under the business name, but I would be the one

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1 responsible for the payment, and not the business.
2 So I took personal responsibility for the credit
3 card, not the business.
4 Q You used the credit card to pay the legal
5 fees, didn't you?
6 A Yes. I was always the one paying the
7 credit card, not the business.
8 Q I've put in front of what you we'll mark
9 as Exhibit 57.
10 (Exhibit No. 57 was marked for
11 identification.)
12 BY MS. PAULOSE:
13 Q Well, first of all, Exhibit 57, the cover
14 page is a declaration of the records custodian of
15 Russell C. Weigel, III, P.A.
16 Do you see on the third page that there's
17 an affidavit of Dorothy Delisfort? Third page.
18 A Yes.
19 Q Is that you?
20 A Yes.
21 Q Is that your signature?
22 A Yes.
23 Q And is that dated February 9, 2009?
24 A Yes.
25 Q And does it describe the payments that

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1 you're making for Mr. Theodule?
2 A That's the lump sum amount that the
3 attorney asked, yes.
4 Q Now -- may I?
5 A Sure.
6 Q Now, directing your attention about
7 probably ten or so pages in. This is a statement
8 for an AirTran business credit card company
9 statement. Did I read that accurately off the top
10 of this page?
11 A Yes.
12 Q And it's listed for D. Delisfort, Wealth
13 Builders Circle, 2108 New London Place in
14 Snellville, Georgia; is that correct?
15 A Yes.
16 Q And is this the card that you described to
17 me earlier, Ms. Delisfort?
18 A Yes.
19 Q Okay. Did you speak to Mr. Theodule about
20 this deposition?
21 A A little bit.
22 Q What did you say?
23 A I told him I had a deposition today.
24 Q What else?
25 A I think he said just be myself, be honest,

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1 and, you know, it's going to work out.
2 Q You're still living in the same residence,
3 correct?
4 A Yes.
5 Q Is Mr. Theodule presently employed?
6 A No.
7 Q You are presently employed as a nurse?
8 A Yes.
9 Q How long has Mr. Theodule been unemployed?
10 A Since you guys froze his account.
11 Q When was that?
12 A I believe in December.
13 Q December of 2008?
14 A Yes, ma'am.
15 MS. PAULOSE: Okay. I have no
16 further questions of this witness at this time.
17 Mr. Weigel or Ms. Van Vliet?
18 MS. VAN VLIET: I have some, but I
19 was wondering whether the exhibit that I had
20 sent up there has made it into the room.
21 MS. PAULOSE: No.
22 MS. VAN VLIET: It's a copy of a
23 letter -- a financial statement dated June --
24 the cover letter is dated June 17th on Maloy
25 Jennings and Parker letterhead.

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1 MS. PAULOSE: Why don't we take a
2 five-minute break.
3 MS. VAN VLIET: I know your assistant
4 sent it up there, Rachel.
5 MS. PAULOSE: Yeah. I don't have a
6 printer here or a way of receiving or printing
7 documents. So let me see if we can find out,
8 if you don't mind.
9 MS. VAN VLIET: If not, I can ask
10 around it. But if it's there, that's great. I
11 want to mark it as an exhibit.
12 MS. PAULOSE: We'll go off the record
13 for five minutes.
14 (A recess was taken.)
15 MS. PAULOSE: Go ahead, Ms. Van
16 Vliet.
17 MS. VAN VLIET: Thank you.
18 EXAMINATION
19 BY MS. VAN VLIET:
20 Q Ms. Delisfort, this is Theresa Van Vliet.
21 You and I have met a couple of times. I represent
22 the Receiver in this action.
23 As with our prior encounters in
24 depositions, if I ask something that you don't
25 understand, please just ask me to go back, and I'll

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1 correct it.
2 A Okay.
3 Q Do you recall in or about -- I'm trying to
4 find the date -- June of this year, early June of
5 this year, executing certain financial documents in
6 front of a notary?
7 A Yes, ma'am.
8 Q And you provided those to Mr. Parker, did
9 you not?
10 A Yes.
11 Q And that package contained your
12 handwritten input and information on your personal
13 background; is that correct?
14 A Yes.
15 Q As well as your assets, correct?
16 A Yes.
17 Q Any insurance policies, correct?
18 A Yes.
19 Q Real estate that you presently own,
20 correct?
21 A Yes.
22 Q Motor vehicles that you own; is that
23 correct?
24 A Yes.
25 Q Investment accounts; is that correct?

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1 A Yes.
2 Q Retirement plans; is that correct?
3 A Yes.
4 Q Jewelry, for example; is that correct?
5 A Yes.
6 Q Any electronic equipment you own?
7 A Yes.
8 Q Any interest in trusts or limited
9 partnerships; is that correct?
10 A Yes.
11 Q And also set forth your claimed
12 liabilities; credit card bills, for example?
13 A Yes.
14 Q Mortgages; is that right?
15 A Yes.
16 Q Notes payable, correct?
17 A Yes.
18 Q And other personal debts you may have; is
19 that right?
20 A Yes.
21 Q Okay. And in addition to your handwritten
22 notations of all of those items, you attached, did
23 you not, various backup material that reflected
24 those items? Is that right?
25 A Yes.

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1 Q And the information contained in there in
2 that financial summary, is it true and accurate to
3 the best of your knowledge?
4 A Yes.
5 Q With the exception of your lawyer,
6 Mr. Parker, or anyone in his office, did you have
7 any assistance from other individuals in preparing
8 that financial affidavit?
9 A No.
10 Q Did you speak with your husband about it?
11 A No.
12 Q You noted that you have insurance with
13 Allstate Insurance Company?
14 A Yes.
15 Q You reflected that you have a home
16 insurance policy; is that correct?
17 A Yes.
18 Q What residence does that insurance policy
19 cover?
20 A 2108 New London Place, Snellville, Georgia
21 30078.
22 Q And that's your current physical
23 residence; is that right?
24 A Yes, ma'am.
25 Q Ms. Paulose asked you about your

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1 deposition testimony on February 9th, 2009 when
2 Mr. Thompson was representing you. Do you recall
3 those questions?
4 A You can ask me. I'll try to remember.
5 Q Was the testimony that you gave on
6 February 9th, 2009 true and accurate to the best of
7 your knowledge?
8 A Yes.
9 Q Similarly, was the testimony that you gave
10 to me in your continued deposition on April 10th,
11 2009 true and accurate to the best of your
12 knowledge?
13 A Yes.
14 Q Do you recall Ms. Paulose's questions
15 regarding statements that you may or may not have
16 made to Mr. Innocent?
17 A Yes.
18 Q And do you recall that she was asking you
19 whether you had told Mr. Innocent that he could
20 double his money within a certain amount of time?
21 Do you recall those questions?
22 A Yes.
23 Q You said that you did not recall who
24 Mr. Innocent was; is that correct?
25 A Yes.

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1 Q Putting aside whether you made such
2 statements to Mr. Innocent, did you ever make any
3 such statement to any investor?
4 A There may be a possibility where I
5 repeated what was told to me, that the company has
6 the potential to double people's money or that they
7 have in the past done so.
8 Q Okay. Tell me about the circumstances in
9 which you may have made those statements to
10 investors.
11 A There were a lot of people coming to the
12 office to find out about the company. A lot of
13 people know that we were investing with CCC. Some
14 people wanted to know how long CCC had been in
15 business, how many times had they actually made
16 people money.
17 And it could be possible that I may have
18 said that to some people, but I don't go advertising
19 this unless somebody comes to me or asks me a
20 question about it.
21 Q Okay. So unless somebody comes in, you
22 wouldn't have told them that, but if they did come
23 in and seek an investment, you would have told them
24 that they could double their money with CCC or by an
25 investment with CCC; is that right?

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1 A We gave them all the options that there
2 were at the office. And they had that option as one
3 of the options.
4 Q And when you say you were repeating things
5 that had been told to you by CCC, were they
6 things -- they were things that had been told to you
7 by George, correct?
8 A Magda is the one that gave me the
9 presentation, and that's the first firsthand
10 information I had received.
11 Q Is it your testimony that you never
12 discussed CCC or its investment, quote, unquote,
13 policies or its return, quote, unquote, potential
14 with your husband?
15 A Not necessarily, no.
16 Q Did you discuss those matters with your
17 husband?
18 A I can't say yes, Theresa, because I can't
19 even recall what conversation it would have been or
20 how the conversation would have been about.
21 Q Did you discuss this -- I'm sorry. Were
22 you finished?
23 A Yeah, I'm finished. I'm finished. Thank
24 you.
25 Q Did you ever discuss business with your

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1 husband?
2 A I'm sure we have.
3 MS. VAN VLIET: Okay. I have nothing
4 further. Thank, you, ma'am.
5 THE WITNESS: Thank you.
6 MS. PAULOSE: Mr. Weigel.
7 MR. WEIGEL: I need to ask Mr. Parker
8 a question. Is he able to call me at the
9 office if we take, like, a five-minute break?
10 MR. PARKER: I mean, I guess I can.
11 I have my cell. I can step out to call, but --
12 sure.
13 MR. WEIGEL: Can you please call me?
14 MR. PARKER: Do you have a number you
15 want me to call? Give me the number.
16 MR. WEIGEL: 686-888-4567.
17 MR. PARKER: Okay. I'll step outside
18 and make the phone call.
19 MR. WEIGEL: It will be less than
20 five minutes.
21 MS. PAULOSE: Go off the record.
22 (A recess was taken.)
23 MS. PAULOSE: Go back on the record.
24 Go ahead, Mr. Weigel.
25 MR. WEIGEL: Can y'all hear me?

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1 MS. PAULOSE: Yes.
2 MR. WEIGEL: I have no questions.
3 MR. PARKER: If I might just put on
4 the record that I'm going to make a copy of
5 the -- what is in effect -- it's not even a
6 duplicate. It's one of those -- you know, with
7 the checks these days, you just have a receipt
8 or whatever of a facsimile of the instrument
9 that you wrote.
10 It's a \$4,000 check in or around October
11 of 2008 issued to Wealth Builders. And I'm
12 going to send a copy of it directly to
13 Ms. Paulose and I'll send a copy to Ms. Van
14 Vliet and Mr. Weigel as well.
15 MS. PAULOSE: And I'll just note for
16 the record we've not had, obviously, the
17 opportunity to cross-examine Ms. Delisfort
18 about that check. And if there are any other
19 documents in your possession that are
20 responsive to the subpoena, I, again, urge you
21 to comply with the subpoena so we don't need to
22 take further action.
23 I have no further questions. Does any
24 other counsel here have any questions?
25 MS. VAN VLIET: No thanks.

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1 MS. PAULOSE: Thank you.
2 (Deposition concluded at 11:41 a.m.)
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DISCLOSURE

1
2 STATE OF GEORGIA
3 COUNTY OF FULTON

4 DEPOSITION OF: DOROTHY DELISFORT

5 Pursuant to Article 8.B of the Rules and
6 Regulations of the Board of Court Reporting of the
7 Judicial Council of Georgia, I make the following
8 disclosure:

9 I am a Georgia Certified Court Reporter.
10 I am here as an independent contractor for American
11 Court Reporting Company, Inc.

12 The firm was contracted by the offices
13 of Rachel K. Paulose to provide court reporting
14 services for this deposition. The firm will not be
15 taking this deposition under any contract that is
16 prohibited by O.C.G.A. 15-14-37(a) and (b).

17 Option A: The firm has no contract/agreement to
18 provide reporting services with any party to the
19 case, any counsel in the case, or any reporter or
20 reporting agency from whom a referral might have
21 been made to cover this deposition. The firm will
22 charge its usual and customary rates to all parties
23 in the case, and a financial discount will not be
24 given to any party to this litigation.

25 (Signature of Attorneys optional)

August 13, 2009

GALA M. REZNICK, CCR-B-826

Attorney for Plaintiff

Date:

Attorney for Defendant

Date:

C E R T I F I C A T E

1
2
3 STATE OF GEORGIA)
4 COUNTY OF FULTON)

5
6 I hereby certify that the foregoing
7 transcript was taken down, as stated in the
8 caption, and the proceedings were reduced to
9 typewriting under my direction and control.

10 I further certify that the transcript is a
11 true and correct record of the evidence given
12 at the said proceedings.

13 I further certify that I am neither a
14 relative or employee or attorney or counsel to
15 any of the parties, nor financially or
16 otherwise interested in this matter.

17 This the 20th day of August, 2009.

18
19
20
21
22 _____
23 GALA M. REZNICK, B-826
24
25

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