

In The Matter Of:

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

*George L. Theodule
August 14, 2009*

*American Court Reporting Company, Inc.
52 Executive Park South
Suite 5201
Atlanta, Georgia 30329-2217
(404) 892-1331 - (800) 445-2842*

Original File 58589.TXT

Min-U-Script® with Word Index

This Page Intentionally Left Blank

<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 GEORGE L. THEODULE, 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 10:21 a.m., on this the 14th 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 style="text-align: right;">Page</p> <p>4 Examination by Ms. Paulose.....8</p> <p>5 Examination by Ms. Van Vliet.....160</p> <p style="text-align: center;">E X H I B I T S</p> <p>7 Plaintiff's Exhibit No. Description Page</p> <p>8</p> <p>9 58 Notice of Deposition 19</p> <p>10 59 E-mail dated January 30, 2009 to 20 Charles Pickett from George Theodule</p> <p>11</p> <p>12 60 Transcript of the deposition 23 of George Theodule taken April 9, 2009</p> <p>13</p> <p>14 61 Defendant Theodule's Answer 27 to Complaint for Injunctive and Other Relief</p> <p>15</p> <p>16 62 Defendant Theodule's Accounting 29 and Identification of Accounts</p> <p>17</p> <p>18 63 Defendant George L. Theodule's 33 Notice of Serving Responses and Objections to Plaintiff's First Request for Admissions</p> <p>19</p> <p>20 64 Declaration of Records Custodian 34 of Russell C. Weigel, III, P.A. attaching documents</p> <p>21</p> <p>22 65 Florida Department of State 35 Corporations Division Record for Creative Capital Concepts</p> <p>23</p> <p>24 66 Florida Department of State 37 Corporations Division Record for A Creative Capital Concepts, LLC</p> <p>25</p>
<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. Senior Trial Counsel United States Securities and Exchange Commission 801 Brickell Avenue Suite 1800 Miami, Florida 33131 305-982-6318 pauloser@sec.gov</p> <p>7 For the Receiver (via telephone):</p> <p>9 THERESA VAN VLIET, Esq. Genovese, Joblove & Battista 200 East Broward Boulevard Suite 1110 Fort Lauderdale, Florida 33301 954-453-8012 tvanvliet@gjb-law.com</p> <p>13 HARRIS J. KOROGLU, Esq. Genovese, Joblove & Battista 4400 Bank of America Tower 100 Southeast Second Street Miami, Florida 33131 305-349-2300 hkoroglu@gjb-law.com</p> <p>17 For the Defendant George Theodule (via telephone):</p> <p>18 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 style="text-align: right;">Page 4</p> <p>1 67 Florida Department of State 38 Corporations Division Record for Creative Capital Consortium, LLC</p> <p>2</p> <p>3 68 Florida Department of State 39 Corporations Division Record for Smart Investment Management Services, LLC</p> <p>4</p> <p>5 69 Copy of SIMS Web page 41</p> <p>6</p> <p>7 70 E-mail dated May 20, 2008 to 42 Andrea Appelman from Neptime Dieujuste</p> <p>8</p> <p>9 71 Florida Department of State 43 Corporations Division Record for Reverse Auto Loan, LLC</p> <p>10</p> <p>11 72 Florida Department of State 44 Corporations Division Record, for Elite Luxury Travel, LLC</p> <p>12</p> <p>13 73 Florida Department of State 45 Corporations Division Record for Bliss Travel Management, LLC</p> <p>14</p> <p>15 74 Florida Department of State 46 Corporations Division Record for Carribean Airways, LLC</p> <p>16</p> <p>17 75 Florida Department of State 47 Corporations Division Record for Unity Entertainment Group, Inc.</p> <p>18</p> <p>19</p> <p>20 76 Florida Department of State 47 Corporations Division Record for Reverse Home Loan, LLC</p> <p>21</p> <p>22 77 Florida Department of State 48 Corporations Division Record for Good Buy Homes, Inc.</p> <p>23</p> <p>24 78 Florida Department of State 49 Corporations Division Record for Wow! We Made Double</p> <p>25</p>

Page 5

1	79	Florida Department of State Corporations Division Record for Earlyviews, Inc.	50
2			
3	9	Creative Capital Consortium Business Plan	51
4			
5	11	E-mail dated September 26, 2008 to Linda S. Schmidt from Berthrum Brewster	62
6			
7	80	List of Contacts	72
8	81	Agenda	73
9	82	Declaration of Angela Telasco	97
10	83	Memo dated 1/29/08 To Whom It May Concern signed by George Theodule	114
11	84	optionsXpress Joint Account Application for Detra A. Pasby and George L. Theodule, Jr.	116
12			
13	85	E-mails from optionsXpress to Detra A. Pasby	119
14			
15	86	Gmail - Fnivose	124
16	87	Gmail - Julius	126
17	88	Myway - George	129
18	89	Yahoo - George Email 1	133
19	90	Yahoo - George Email 2	140
20	91	Yahoo - George Email 3	144
21	92	optionsXpress Account Opening Documents	146
22	93	optionsXpress Account Statements	155
23	94	Trade Confirmations	156
24	95	optionsXpress Deposit and Withdrawal Activity	157
25			

Page 7

1 PROCEEDINGS

2 MS. PAULOSE: I'm going on the record

3 right now to just note that the time is 10:03.

4 At about 9:19 this morning, I received an

5 e-mail from Mr. Theodule's counsel saying that

6 Mr. Theodule is running about 30 minutes late

7 this morning, end quote.

8 And it is now 10:04 a.m. in Atlanta, and

9 we have no signs of the witness or his counsel.

10 This is Rachel Paulose with the SEC. And on

11 the line, please?

12 MR. KOROGLU: This is Harris Koroglu

13 of Genovese, Joblove & Battista on behalf of

14 the Receiver, Jonathan Perlman.

15 MS. PAULOSE: Harris, thanks for

16 joining us. We'll just stay on hold until the

17 witness arrives.

18 Go back off the record.

19 (Discussion ensued off the record.)

20 MS. PAULOSE: Mr. Theodule has just

21 entered the room. It is now 10:21 a.m.

22 Good morning, Mr. Theodule.

23 THE WITNESS: Good morning,

24 Ms. Paulose.

25 MS. PAULOSE: I'm Rachel Paulose with

Page 6

1	96	Army - George Emails	157
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

Page 8

1 the United States Securities and Exchange

2 Commission, and we're here to take your

3 deposition this morning, as you know.

4 Mr. Theodule, would you please raise your

5 right hand and be sworn by the court reporter.

6 (Whereupon,

7 GEORGE L. THEODULE,

8 was called as a witness and having first

9 been duly sworn, was examined and testified

10 as follows:)

11 EXAMINATION

12 BY MS. PAULOSE:

13 Q And, Mr. Theodule, you are represented by

14 counsel; is that correct?

15 A That is correct.

16 Q Okay. Your counsel is participating via

17 telephone; is that correct?

18 A That's what he's supposed to be. I don't

19 know. I haven't heard his voice yet.

20 MS. PAULOSE: Let's get appearances

21 on the record for the court reporter. Would

22 everyone -- here in this room is myself,

23 Mr. Theodule, and the court reporter.

24 Could we get appearances on the phone,

25 please.

Page 9

1 MR. WEIGEL: This is Russ Weigel for
2 Mr. Theodule.
3 MS. PAULOSE: Thank you. Good
4 morning, Russ.
5 MR. WEIGEL: Good morning.
6 MR. KOROGLU: On behalf of Jonathan
7 Perlman, the court-appointed receiver of
8 Creative Consortium, LLC and Creative Capital
9 Concepts, LLC, this is Harris Koroglu and
10 Theresa Van Vliet of Genovese, Joblove &
11 Battista in Miami, Florida.
12 MS. PAULOSE: Good morning, Harris.
13 MR. KOROGLU: Good morning.
14 BY MS. PAULOSE:
15 Q Are you ready to begin, Mr. Theodule?
16 A Give me a minute, please.
17 Q Okay.
18 A Yes.
19 Q Mr. Theodule, could you please state and
20 spell your full name for the court reporter.
21 A George Louis Theodule, G-e-o-r-g-e
22 L-o-u-i-s T-h-e-o-d-u-l-e.
23 Q Thank you, Mr. Theodule.
24 Are you known by any other names, sir?
25 A No.

Page 10

1 Q You have had your deposition taken before;
2 is that correct?
3 A Yes.
4 Q So let me just go over a few ground rules
5 with you so you understand what we're doing here
6 this morning.
7 First of all, you understand that you are
8 under oath to tell the full truth just as if you
9 were in court. Do you understand that?
10 A Yes.
11 Q The court reporter is taking down your
12 testimony as you and I speak. And so it's very
13 important that you give a verbal response to the
14 questions that I ask. Do you understand that?
15 A Yes.
16 Q So, for example, if you nod your head or
17 say uh-huh, that's not going to show up on the
18 record. And so I will remind you if you do that so
19 that we get a clear record here. Do you understand
20 that?
21 A Yes.
22 Q Okay. Please let me finish asking my
23 question before you start to answer. Do you
24 understand that?
25 A Yes.

Page 11

1 Q And, also, if at any time you don't
2 understand any of my questions, just let me know.
3 I'll do my best to rephrase it. Do you understand
4 that?
5 A Yes.
6 Q Okay. Of course, if you do answer a
7 question, then I'm going to assume that you did
8 understand it, and I'll proceed accordingly.
9 Mr. Theodule, if at any time you need a
10 break, just as the one that we just took, please
11 feel free to let me know and we will take a break,
12 including if you need to confer with your counsel.
13 I do ask that we not take a break while a question
14 is pending. Do you understand that?
15 A Yes.
16 Q Now, from time to time your attorney may
17 object for the record to a question. You should let
18 your attorney make the objection, but then you're
19 required to answer the question unless your attorney
20 instructs you not to. Do you understand that?
21 A Yes.
22 Q Okay. And, Mr. Weigel, you feel free to
23 break in as well if you need to confer with your
24 client. I understand, particularly since you're on
25 the phone.

Page 12

1 Mr. Theodule, are you on any medication or
2 any other substance that would affect your ability
3 to testify truthfully this morning?
4 A No.
5 Q Okay. Please state your current address.
6 A 2108 New London Place, Snellville, Georgia
7 30078.
8 Q Mr. Theodule, have you ever been -- are
9 you familiar with this address, 10176 Sheila Court,
10 Wellington, Florida 33414?
11 A Yes.
12 Q What is that address?
13 A My former address.
14 Q Okay. And when did you live on Sheila
15 Court?
16 A In 2007.
17 Q Just during that calendar year, sir?
18 A Yes.
19 Q Are you familiar with an address 9075
20 DuPont Place in Wellington, Florida 33414?
21 A DuPont?
22 Q Correct.
23 A I don't think it was called DuPont, but I
24 do know the location what you're talking about --
25 Q What is that?

Page 13

1 A -- in Wellington.
2 Q I'm sorry. What is that?
3 A What's that?
4 Q You say you do know the location. How do
5 you know the location?
6 A I lived there.
7 Q Okay.
8 A But it wasn't DuPont. It was something
9 else, I think.
10 Q Okay.
11 A Maybe my memory fails me, but I lived in
12 that community.
13 Q In Wellington?
14 A In Wellington.
15 Q How about 9075 DuPont Road in Wellington
16 33414? Is that an address you're familiar with?
17 A Is that the same one you just gave me
18 before?
19 Q No. The prior address was place. This is
20 road.
21 A Oh. I think when I lived there it was
22 court.
23 Q DuPont Court?
24 A But it wasn't DuPont. I think it was a
25 different address.

Page 14

1 Q Okay. How about 3156 Hamblin Way in
2 Wellington, Florida 33414?
3 A Yes.
4 Q What is that address, Mr. Theodule?
5 A My former address.
6 Q And when did you live there?
7 A In 2008.
8 Q Can you tell me any more specifically than
9 2008? When during 2008 did you live there?
10 A I'm not sure of the exact dates that I
11 moved in or out, but it was between 2007 and 2008,
12 within that range.
13 Q Thank you. What about 6101 Loquat,
14 L-o-q-u-a-t, Circle in Tamarac, Florida 33319? Do
15 you know that address?
16 A Not at all.
17 Q Okay. What about 4279 Lock Island
18 Parkway, Roswell, Georgia 30075? Do you know that
19 address?
20 A Never heard of it.
21 Q What about 1389 Stanwood Drive, Number 1,
22 in San Jose, California 95118? Do you know that
23 address?
24 A Yes.
25 Q What is that address, sir?

Page 15

1 A My former address.
2 Q And when did you live there?
3 A Between '85 and '87. Probably '85 and '86.
4 Q And why were you living in San Jose,
5 California between '85 and '86?
6 A That's -- I was there for over 20 years.
7 Q I see.
8 A I was in San Jose, California.
9 Q Correct. Not at Stanwood Drive?
10 A Right.
11 Q What about 429 Lenox Avenue, Miami Beach,
12 Florida 33139? Do you recognize that address at
13 all?
14 A No.
15 Q What about 1111 Hypoluxo Road in Lantana,
16 Florida 33462? Do you recognize that address?
17 A Are these supposed to be my addresses?
18 Q I ask the questions, Mr. Theodule.
19 What about 8461 Lake Worth Road in Lake
20 Worth, Florida 33467? Do you recognize that
21 address?
22 A Yes.
23 Q What is that address, Mr. Theodule?
24 A That is the address of the home office.
25 Q And by "home office --"

Page 16

1 MR. WEIGEL: Excuse me, George.
2 MS. PAULOSE: Go ahead, Mr. Weigel.
3 MR. WEIGEL: Mr. Theodule will be
4 taking the Fifth Amendment as to any
5 substantive questions. He'll be asserting his
6 Fifth and Fourteenth Amendments of the U.S.
7 Constitution. And for the purposes of, you
8 know, this deposition, we would like to reach
9 agreement on how he asserts that.
10 MS. PAULOSE: What's your basis for
11 the Fourteenth Amendment objection, Mr. Weigel?
12 MR. WEIGEL: Well, as you know, that
13 applies to states -- to the extent this
14 deposition might be used by any state in any
15 criminal matter.
16 MS. PAULOSE: All right. Well, we're
17 here for a federal case, but, in any event,
18 that's fine.
19 BY MS. PAULOSE:
20 Q We can stipulate, Mr. Theodule, that if
21 you would like to assert your rights under the Fifth
22 Amendment to the United States Constitution or the
23 Fourteenth Amendment to the United States
24 Constitution or any state provisions, you may simply
25 state Fifth, and I will understand that you are

Page 17

1 invoking your rights pursuant to those
2 constitutional guarantees. Do you understand that?
3 A I understand that.
4 MS. PAULOSE: Okay. So, Mr. Weigel,
5 are you giving -- Mr. Theodule had answered the
6 question as to 8461 Lake Worth Road.
7 MR. WEIGEL: He started to. I
8 instruct him to answer Fifth.
9 THE WITNESS: Fifth.
10 BY MS. PAULOSE:
11 Q So you're invoking your rights -- you were
12 starting to explain something, Mr. Theodule, but
13 you're invoking your rights -- your constitutional
14 rights under the Fifth Amendment and others to my
15 question about further details about CCC
16 headquarters; is that correct?
17 A I don't know if you identified it as CCC
18 headquarters. Before you just asked me about the
19 address, and my answer is Fifth.
20 Q Mr. Theodule, is 8461 Lake Worth Road,
21 Lake Worth, Florida -- when you said it was the home
22 office, do you mean the headquarters for Creative
23 Capital Consortium or Creative Capital Concepts? Is
24 that what you meant?
25 A My answer was Fifth. I did not complete

Page 18

1 my description.
2 MR. WEIGEL: Just say Fifth, George.
3 THE WITNESS: Fifth.
4 BY MS. PAULOSE:
5 Q And you know that address because you were
6 the head of Creative Capital Consortum or Creative
7 Capital Concepts, which I'll refer to as CCC during
8 the course of this deposition, true, Mr. Theodule?
9 MR. WEIGEL: George, Fifth.
10 THE WITNESS: Fifth.
11 BY MS. PAULOSE:
12 Q Okay. Mr. Theodule, do you recognize this
13 phone number, 561-228-1635?
14 MR. WEIGEL: Fifth, George.
15 THE WITNESS: Fifth.
16 BY MS. PAULOSE:
17 Q Do you recognize this phone number,
18 561-685-2580?
19 A Fifth.
20 Q Mr. Theodule, do you recognize this phone
21 number, 678-908-0006?
22 MR. WEIGEL: Same, George.
23 THE WITNESS: Fifth.
24 MR. WEIGEL: Keep it going.
25 THE WITNESS: Okay.

Page 19

1 BY MS. PAULOSE:
2 Q Mr. Theodule, do you recognize this phone,
3 404-424-3956?
4 A Fifth.
5 Q I'll get a preliminary matter out of the
6 way that I should have addressed earlier.
7 Mr. Theodule, I'm handing you what's been
8 marked -- what we will mark as Exhibit 58 in this
9 case. It's a copy of the notice of deposition in
10 this matter.
11 (Exhibit No. 58 was marked for
12 identification.)
13 BY MS. PAULOSE:
14 Q You understand that -- or I understand
15 that you are testifying this morning pursuant to the
16 SEC's notice, correct?
17 A Yes.
18 Q And you have seen this notice before,
19 Mr. Theodule?
20 A No.
21 Q Okay. But you are here on -- I presume on
22 instruction of your attorney who gave you knowledge
23 of this?
24 A Yes.
25 Q Okay. Now, I just asked you about these

Page 20

1 two phone numbers, 404-424-3956 and 678-908-0006.
2 The reason I ask you that question, Mr. Theodule, is
3 because you represented that to be your contact
4 information. Do you recall that?
5 MR. WEIGEL: Same answer, George.
6 Come on.
7 THE WITNESS: Fifth.
8 (Exhibit No. 59 was marked for
9 identification.)
10 BY MS. PAULOSE:
11 Q Mr. Theodule, I'm placing in front of you
12 what we'll mark as Exhibit 59 in this matter.
13 Exhibit 59, Mr. Theodule, is an e-mail. And it's
14 from you, George Theodule, to a number of people.
15 First of all, Mr. Theodule, what is your e-mail
16 address?
17 A Fifth.
18 MR. WEIGEL: Fifth, George.
19 BY MS. PAULOSE:
20 Q Mr. Theodule, it's true that your e-mail
21 address is georgetheodule@yahoo.com, correct?
22 A Fifth.
23 Q You also used another e-mail called
24 georgetheodule@us.army.mil, correct?
25 A Fifth.

Page 21

1 Q You also used another e-mail called
2 powerofone@myway.com, correct?
3 A Fifth.
4 Q And on this exhibit that I placed in front
5 of you, Exhibit No. 59, you were using your
6 georgetheodule@yahoo.com account, correct?
7 A Fifth.
8 MR. WEIGEL: Excuse me, Rachel.
9 Which -- we can't see -- you've given us a
10 bunch of documents that are e-mails, and I
11 can't tell from your questions which one you're
12 referring to.
13 MS. PAULOSE: Let me describe it
14 further, Mr. Weigel.
15 BY MS. PAULOSE:
16 Q It's just a one-page document. For the
17 record, Mr. Theodule, this says from George and the
18 address is georgetheodule@yahoo.com sent Friday,
19 January 30th, 2009 at 7:32 p.m. to Pickett, Charles
20 L.; hurley@flsd.uscourts.gov; also,
21 hopkins@flsd.uscourts.gov. On the cc line are Brian
22 K. Barry, David C. Cimo, Carmen Contreras-Martinez,
23 and Jesus Suarez. The subject is RE: Re SEC vs.
24 Creative Capital Consortium, et al.
25 Below this initial e-mail is an e-mail

Page 22

1 from Charles Pickett. And Mr. Pickett was your
2 prior counsel; is that correct, Mr. Theodule?
3 A Fifth.
4 Q Mr. Pickett sent an e-mail to all of these
5 individuals, including yourself. And, among other
6 things, he provided to the Court your contact
7 information. And he provided a telephone number and
8 an e-mail address including
9 georgetheodule@yahoo.com; is that correct?
10 A Fifth.
11 Q And then in response to Mr. Pickett's
12 e-mail, you, Mr. Theodule, from your
13 georgetheodule@yahoo.com account responded with this
14 message: "Mr. Pickett, that number is incorrect.
15 This is the right number: 404-424-3956 or
16 678-908-0006. Thank you." Did I read that
17 correctly, Mr. Theodule?
18 A You read that correctly.
19 MR. WEIGEL: Fifth.
20 THE WITNESS: Fifth.
21 BY MS. PAULOSE:
22 Q Okay. Mr. Theodule, could you please
23 state for the record your Social Security number?
24 A Fifth.
25 Q In fact, your Social Security number is

Page 23

1 361-60-1582; is that correct, Mr. Theodule?
2 A Fifth.
3 Q Mr. Theodule, you have been previously
4 deposed in the Receiver's case in this matter; is
5 that correct, sir?
6 MS. PAULOSE: Mr. Weigel, I think
7 your --
8 MR. WEIGEL: You can answer.
9 THE WITNESS: Yes.
10 (Exhibit No. 60 was marked for
11 identification.)
12 BY MS. PAULOSE:
13 Q Okay. I'm placing in front of you what we
14 will mark as Exhibit 60 in this case. Do you recall
15 that Ms. Van Vliet questioned you on behalf the
16 receiver during that deposition, Mr. Theodule?
17 A Yes.
18 Q And you gave sworn testimony on April 9th,
19 2009; is that correct, Mr. Theodule?
20 A Yes.
21 Q And you were under oath then, just as
22 you're under oath now, to tell the whole truth; is
23 that correct, Mr. Theodule?
24 A Yes.
25 Q And did you tell the whole truth,

Page 24

1 Mr. Theodule?
2 A Yes.
3 Q Let's turn to page 152 of this document,
4 Mr. Theodule. What's in front of you now,
5 Mr. Theodule, is a transcription of your sworn
6 testimony. Do you understand that?
7 A Yes.
8 Q Okay. And if you turn to page 152 of your
9 sworn testimony, sir, if I could direct your
10 attention to line 23. I'm just going to start
11 reading.
12 "Question: By the way, what's your Social
13 Security number?"
14 "Answer: 361-60-1582."
15 Mr. Theodule, did I read that correctly?
16 MR. WEIGEL: Fifth.
17 THE WITNESS: Fifth.
18 BY MS. PAULOSE:
19 Q So, in fact, you previously testified
20 under oath in testimony that you just told me was
21 truthful that your Social Security number, in fact,
22 is 361-60-1582, true, Mr. Theodule?
23 MR. WEIGEL: Fifth.
24 THE WITNESS: Fifth.
25 MS. PAULOSE: Our position for the

Page 25

1 record is that that assertion of the Fifth has
2 been waived, but I will move on.
3 BY MS. PAULOSE:
4 Q Mr. Theodule, could you please tell me
5 about your educational background, sir?
6 MR. WEIGEL: Fifth.
7 THE WITNESS: Fifth.
8 BY MS. PAULOSE:
9 Q Mr. Theodule, could you please tell me
10 about your professional background?
11 MR. WEIGEL: Fifth.
12 THE WITNESS: Fifth.
13 BY MS. PAULOSE:
14 Q What experience do you possess,
15 Mr. Theodule, specifically as an investor?
16 A Fifth.
17 MR. WEIGEL: Fifth.
18 BY MS. PAULOSE:
19 Q Did you tell other people, including
20 investors in CCC, that you had experience as an
21 investor?
22 A Fifth.
23 Q Did you tell investors you were a
24 successful investor?
25 A Fifth.

Page 26

1 Q Let me ask you about the organization of
2 CCC, Mr. Theodule. Who were the employees of CCC?
3 A Fifth.
4 Q Who hired those employees, Mr. Theodule?
5 A Fifth.
6 Q You hired those employees, didn't you,
7 Mr. Theodule?
8 A Fifth.
9 Q What was the hiring process for CCC
10 employees, Mr. Theodule?
11 A Fifth.
12 Q Did you ever interview competitively for
13 CCC positions, Mr. Theodule?
14 A Fifth.
15 Q Did you ever advertise positions at CCC?
16 A Fifth.
17 Q Or did you simply hire friends and
18 relatives and friends of friends?
19 A Fifth.
20 Q Mr. Theodule, who put together the
21 introductory documents to CCC?
22 A Fifth.
23 Q Did you help put together introductory
24 documents for CCC, Mr. Theodule?
25 A Fifth.

Page 27

1 Q Mr. Theodule, are you known for ever
2 employing any types of slogans or catch phrases?
3 A Fifth.
4 Q For example, did you ever typically sign
5 off messages or communications saying something like
6 "Saving one life at a time"?
7 A Fifth.
8 Q Did you sign off saying things like "Have
9 a blessed day"?
10 A Fifth.
11 Q Okay. Mr. Theodule, you're familiar with
12 the Complaint in this matter?
13 A Fifth.
14 Q You filed an Answer to that Complaint,
15 sir?
16 A Fifth.
17 (Exhibit No. 61 was marked for
18 identification.)
19 BY MS. PAULOSE:
20 Q I'm putting in front of you what we'll
21 mark as Exhibit 61, sir. This is your answer to the
22 Complaint, Mr. Theodule. Do you recognize that
23 document?
24 A Fifth.
25 Q Mr. Theodule, directing your attention to

Page 28

1 paragraph 4, it says, "As to paragraph 4, Theodule
2 admits a net trading loss." Did I read that
3 correctly, sir?
4 A Fifth.
5 Q And directing your attention to paragraphs
6 12 and 14, sir. Paragraph 12 says, "As to paragraph
7 20, Theodule admits that SIMS is a private company."
8 Did I read that correctly, Mr. Theodule?
9 A Fifth.
10 Q And directing your attention, sir, to
11 paragraph 15, it says, "As to paragraph 32, Theodule
12 admits the second sentence to the extent it implies
13 that SIMS is not a governmental regulatory agency,"
14 with governmental in italics. Did I read that
15 correctly, sir?
16 A Fifth.
17 Q Directing your attention back to paragraph
18 11, Mr. Theodule, it says, "As to paragraph 18,
19 Theodule admits that Defendant have raised more than
20 \$23.4 million." Did I read that correctly,
21 Mr. Theodule?
22 A Fifth.
23 Q You also admitted in this Answer,
24 Mr. Theodule, that you lost approximately 97 percent
25 of the more than \$18.3 million deposited in

Page 29

1 brokerage accounts you controlled, directing your
2 attention to paragraph 11 and 14. Correct,
3 Mr. Theodule?
4 A Fifth.
5 Q Okay. Mr. Theodule, you were required by
6 the Court to file an accounting in this case. Is
7 that true, sir?
8 A Fifth.
9 (Exhibit No. 62 was marked for
10 identification.)
11 BY MS. PAULOSE:
12 Q And now I'm putting in front of you what
13 we'll mark, sir, as Exhibit 62 in this matter. This
14 is Defendant Theodule's Accounting and
15 Identification of Assets. It's docket entry 23 in
16 this case.
17 Mr. Theodule, directing your attention to
18 the second page. Is that your name and signature on
19 the second page of this document, sir?
20 A Fifth.
21 Q And you gave this sworn statement that was
22 notarized directing your attention to the last
23 paragraph of this filing. Do you see that,
24 Mr. Theodule?
25 A Fifth.

Page 30

1 Q And you swore to tell the whole truth; is
2 that true, Mr. Theodule?
3 A Fifth.
4 Q Did you, in fact, tell the truth in this
5 accounting, Mr. Theodule?
6 A Fifth.
7 Q Mr. Theodule, if I may direct your
8 attention to paragraph 3(b). It says, "Subject to
9 the foregoing statement set forth in paragraph 3(a)
10 above --" may I help you? "-- attached as Exhibit C,
11 is a list of all assets, funds, or other properties
12 held by me, jointly or individually, or for my
13 direct or indirect beneficial interest, or over
14 which I maintain control, wherever situated, can I
15 recall in good faith, and stating the location and
16 value of each such asset, fund, and other property."
17 Did I read that correctly, Mr. Theodule?
18 A Fifth.
19 Q Now, sir, directing your attention, then,
20 to Exhibit C regarding which I just read. May I
21 help you?
22 Exhibit C, Mr. Theodule, it lists George
23 Theodule's assets. Do you see that, sir, at the top
24 of the page?
25 A Fifth.

Page 31

1 Q And the last line under George Theodule's
2 assets describes a leased home for the benefit of
3 Unity Entertainment. Do you see that, sir?
4 A Fifth.
5 Q And that was an entity over which you had
6 control because of CCC money; is that true,
7 Mr. Theodule?
8 A Fifth.
9 Q And then the second half of this page,
10 sir, directing your attention to CCC investments
11 and/or assets, lists a number of organizations,
12 including Early Views, in parens it says Kathryn
13 Parker, Unity Entertainment, Unity Entertainment
14 again, Caribbean Airways, Elite Luxury Travel, and
15 Sky King. Do you see that, Mr. Theodule?
16 A Fifth.
17 Q These were all organizations that were
18 funded by CCC and investor money; is that correct,
19 Mr. Theodule?
20 A Fifth.
21 Q Now, sir, if I may your direct your
22 attention to Exhibit D of this accounting. May I
23 help you?
24 Exhibit D also lists assets. Do you see
25 that the first paragraph says "Bank of North

Page 32

1 Georgia, account number 010-009-811-0, Creative
2 Capital Consortitum, LLC"? Did I read that
3 accurately, Mr. Theodule?
4 A Fifth.
5 Q And then it lists optionsXpress accounts
6 over which you had control, including those of
7 Edwige Benoit, Carl Armando, Gerrard Jean Pierre,
8 Houstan Delisfort, Duckens Delisfort, Dorothy
9 Delisfort, Georgette Delisfort, Jufabi, Powerofone,
10 and George Theodule. Did I read that correctly,
11 Mr. Theodule?
12 A Fifth.
13 Q And then it also lists TradeStation
14 accounts for Hugo Medor, Jean Dupe, Patrick Elian,
15 and George Theodule. Did I read that correctly,
16 Mr. Theodule?
17 A Fifth.
18 Q It also lists brokerage accounts for CCC
19 or Research for Forex. Did I read that correctly,
20 Mr. Theodule?
21 A Fifth.
22 Q These were all entities over which you had
23 control; isn't that true, Mr. Theodule?
24 A Fifth.
25 Q Mr. Theodule, the Securities and Exchange

Page 33

1 Commission also sought from you answers regarding
2 your access to documents and information in this
3 case. Do you recall that, sir?
4 A Fifth.
5 Q And you filed a response to our questions
6 through your counsel, sir. We'll mark this as one
7 exhibit.
8 (Exhibit No. 63 was marked for
9 identification.)
10 BY MS. PAULOSE:
11 Q This will be Exhibit 63, Defendant George
12 Theodule's Responses to the SEC's Request for
13 Admissions and Interrogatories. Is that true,
14 Mr. Theodule?
15 A Fifth.
16 Q And directing your attention,
17 Mr. Theodule, to the last page of the request for
18 interrogatories, Mr. Theodule, is that your name and
19 signature on the last page?
20 MR. WEIGEL: You can answer, George.
21 THE WITNESS: Yes.
22 BY MS. PAULOSE:
23 Q And you asserted the Fifth Amendment in
24 response to every single one of the Commission's
25 interrogatories and requests for admissions, true,

Page 34

1 Mr. Theodule?
2 A Fifth.
3 (Exhibit No. 64 was marked for
4 identification.)
5 BY MS. PAULOSE:
6 Q I'm putting in front of you, Mr. Theodule,
7 a document that's labeled "Declaration of Records
8 Custodian of Russell C. Weigel," has a cover letter
9 from your counsel, an affidavit from your wife, and
10 billing records.
11 Were you involved at all in the
12 preparation of these materials, Mr. Theodule?
13 MR. WEIGEL: Objection as to form.
14 BY MS. PAULOSE:
15 Q You may answer, Mr. Theodule.
16 A No.
17 Q Okay. May I see this for a moment.
18 Mr. Theodule, are you aware of where the
19 money is coming from to pay your legal bills?
20 A Fifth.
21 Q Are you aware -- directing your attention
22 to the page that's labeled at the top AirTran
23 business credit card company statement. Are you
24 aware that your wife is using a Wealth Builders
25 Circle credit card to pay your legal bills?

Page 35

1 A Fifth.
2 Q And that money is CCC money, true,
3 Mr. Theodule?
4 A Fifth.
5 MR. WEIGEL: Objection. Misstates
6 evidence.
7 BY MS. PAULOSE:
8 Q Mr. Theodule, I previously asked you about
9 your involvement with a number of entities. And I
10 would just like to go through that now.
11 Placing in front of you, sir, a Florida
12 Department of State, Division of Corporations record
13 that we'll mark as Exhibit 65, sir.
14 (Exhibit No. 65 was marked for
15 identification.)
16 BY MS. PAULOSE:
17 Q Sir, this is a fictitious name detail for
18 Creative Capital Concepts. And it's dated -- file
19 date is October 30th, 2007. Did I read that
20 correctly?
21 A Fifth.
22 Q And the mailing address is 10176 Sheila
23 Court, Wellington, Florida 33414; is that correct,
24 Mr. Theodule?
25 A Fifth.

Page 36

1 Q And that's an address where you had
2 previously lived, correct, Mr. Theodule?
3 A Fifth.
4 Q And you're also listed as the owner of
5 Creative Capital Concepts, true, Mr. Theodule?
6 A Fifth.
7 MR. WEIGEL: I'm sorry, Rachel. You
8 sent one for A Creative Capital Concepts and
9 Creative Concepts. Which one are you looking
10 at?
11 MS. PAULOSE: I am looking at
12 Creative Capital Concepts.
13 MR. WEIGEL: And that is Exhibit 65?
14 MS. PAULOSE: That's Exhibit 65.
15 MR. WEIGEL: A one-page document?
16 MS. PAULOSE: It's actually three
17 pages. It's got a State of Florida attachment
18 signed by Dan Browning and an application for
19 registration of fictitious name behind it.
20 I'll make sure that you get a complete set
21 of everything, Mr. Weigel, if you don't have
22 it. But you should have everything.
23 MR. WEIGEL: It didn't come like that
24 so -- we have one page.
25 MS. PAULOSE: Okay. Well, what I'm

Page 37

1 showing him is --
2 MR. WEIGEL: All right.
3 BY MS. PAULOSE:
4 Q Okay. Mr. Theodule, you're also the
5 manager of Creative Capital Concepts with a dollar
6 sign, LLC, true?
7 A Fifth.
8 (Exhibit No. 66 was marked for
9 identification.)
10 BY MS. PAULOSE:
11 Q And I'm placing in front of you what we'll
12 mark as Exhibit 66. And this is a Florida
13 Department of State, Division of Corporations record
14 which also includes the electronic articles of
15 organization for the Florida limited liability
16 company A Creative Concept with a dollar sign, LLC;
17 is that correct, Mr. Theodule?
18 A Fifth.
19 Q And the mailing address and principal
20 address and the address of the registered agent name
21 is all listed at -- are all listed as 10176 Sheila
22 Court in Wellington, Florida 33414. Is that
23 correct, Mr. Theodule?
24 A Fifth.
25 Q And that is your former home address,

Page 38

1 correct, Mr. Theodule?
2 A Fifth.
3 Q And you are listed as the manager, true,
4 Mr. Theodule?
5 A Fifth.
6 Q Another manager is Debra Pasby; is that
7 correct, Mr. Theodule?
8 A Fifth.
9 Q Ms. Pasby is your ex-fiancee, true,
10 Mr. Theodule?
11 A Fifth.
12 (Exhibit No. 67 was marked for
13 identification.)
14 BY MS. PAULOSE:
15 Q Mr. Theodule, I'm placing in front of you
16 what we'll mark as Exhibit 67. This is the Florida
17 Department of State, Division of Corporations record
18 for Creative Capital Consortitum, LLC. The principal
19 address, the mailing address, the address for the
20 registered agent, and the manager/member detail are
21 all listed as 8641 Lake Worth Road, No. 128, Lake
22 Worth, Florida 33467; is that correct, Mr. Theodule?
23 A Fifth.
24 Q And you, sir, George L. Theodule, are
25 listed as the registered agent and the manager of

Page 39

1 this organization; is that true, Mr. Theodule?
2 A Fifth.
3 Q And, in fact, that was the home office, as
4 you said, of CCC, correct?
5 A Fifth.
6 Q You were also affiliated with an
7 organization called the Smart Investment Management
8 Services, true, Mr. Theodule?
9 A Fifth.
10 (Exhibit No. 68 was marked for
11 identification.)
12 BY MS. PAULOSE:
13 Q Sir, I'm placing in front of you a
14 document, another Florida Department of State,
15 Division of Corporations record, which we'll label
16 Exhibit 68 in this case.
17 Sir, this is a Florida limited liability
18 company detail for the Smart Investment Management
19 Services, LLC, correct?
20 A Fifth.
21 Q And the registered agent name and address
22 is Kathryn Parker at 6801 Lake Worth Road in Green
23 Acres, Florida 33467, correct?
24 A Fifth.
25 Q You helped set up SIMS, true,

Page 40

1 Mr. Theodule?
2 A Fifth.
3 Q The first agent, however, was not
4 Ms. Parker. It was Mario Theodule, a relative of
5 yours, true, Mr. Theodule?
6 A Fifth.
7 Q Sir, if you'll turn to the second page of
8 this document under Article IV it says, "The name
9 and Florida street address of the registered agent:
10 Mario Theodule, 2191 Balan Way, Wellington, Florida
11 33414." That was filed on January 18th, 2008. Did
12 I read that accurately?
13 A Fifth.
14 Q But then at some point Mr. Mario Theodule
15 handed over the leadership of SIMS to Kathryn
16 Parker, true, Mr. Theodule?
17 A Fifth.
18 Q And SIMS was an entity that you set up
19 that you portrayed to investors as being an
20 independent regulatory agency; is that correct,
21 Mr. Theodule?
22 A Fifth.
23 Q In fact, SIMS was not an independent
24 regulatory agency, was it, Mr. Theodule?
25 A Fifth.

Page 41

1 Q And SIMS employees were paid with CCC
2 money, true, Mr. Theodule?
3 A Fifth.
4 Q And, therefore, they had no independent
5 judgment, true, Mr. Theodule?
6 A Fifth.
7 (Exhibit No. 69 was marked for
8 identification.)
9 BY MS. PAULOSE:
10 Q Sir, I'm placing in front of you what
11 we'll label as Exhibit 69 in this case. This is a
12 Web page printout. And the address is
13 <http://igotsims.com/>. Do you recognize this,
14 Mr. Theodule?
15 A Fifth.
16 Q This is the Web printout for the SIMS
17 association regarding which I just asked you
18 questions, true, Mr. Theodule?
19 A Fifth.
20 Q There's a toll free number listed on this
21 document of 1-877-355-SIMS. That was a number that
22 you gave out to investors, true, Mr. Theodule?
23 A Fifth.
24 Q And, sir, directing your attention to the
25 section called "Company Services Information." May

Page 42

1 I help you?
2 If you'll look at the bullet -- fifth
3 bullet down, it says, "Third party verification
4 system in order to protect your business or club and
5 investors." Did I read that accurately, sir?
6 A Yes.
7 Q So you were portraying SIMS as a
8 third-party verification system, true, Mr. Theodule?
9 A Fifth.
10 Q But, in fact, it was not a third-party
11 verification system, was it, Mr. Theodule?
12 MR. WEIGEL: Objection. Misstates
13 evidence.
14 THE WITNESS: Fifth.
15 BY MS. PAULOSE:
16 Q You also had affiliation and control over
17 various investment clubs, true, Mr. Theodule?
18 A Fifth.
19 (Exhibit No. 70 was marked for
20 identification.)
21 BY MS. PAULOSE:
22 Q Sir, I'm handing you what's been -- what
23 we will mark -- I'm sorry -- as Exhibit 70 in this
24 case.
25 Sir, this is an e-mail from Neptime

Page 43

1 Dieujuste sent Tuesday, May 20th, 2008 at 11:53 a.m.
2 to Andrea Appelman. And the subject is Re:
3 Theodules. It reads, "Here's the information about
4 the investment clubs that we discussed earlier.
5 George Theodule, A Creative Capital Concept dollar
6 sign, LLC, Reverse Auto Loan, LLC, Rhetoric
7 Enterprises, Creative Capital Consortium, LLC, and
8 Bliss Travel Management, LLC." Do you recognize
9 those investment club names, Mr. Theodule?
10 A Fifth.
11 Q In fact, those were all investment clubs
12 that you helped set up, true, Mr. Theodule?
13 A Fifth.
14 Q Sir, directing your attention to -- well,
15 actually, placing in front of you a Florida
16 Department of State record for the Florida limited
17 liability company Reverse Auto Loan. We'll mark
18 this as Exhibit 71.
19 (Exhibit No. 71 was marked for
20 identification.)
21 BY MS. PAULOSE:
22 Q Reverse Auto Loan, LLC's principal address
23 is listed as 8461 Lake Worth Road, Suite 127,
24 Lake Worth, Florida 33467. Did I read that
25 accurately, Mr. Theodule?

Page 44

1 A Fifth.
2 Q That's the same address as the CCC home
3 office, true, Mr. Theodule?
4 A Fifth.
5 Q And that principal address is also listed,
6 again, as a mailing address and as well as listed as
7 the address for you as the president; is that
8 correct, Mr. Theodule?
9 A Fifth.
10 Q And your title is listed as president of
11 Reverse Auto Loan, LLC on the bottom of this page as
12 well as the fourth page in you're described as the
13 managing member; is that correct, Mr. Theodule?
14 A Fifth.
15 Q This is another entity over which you had
16 control, correct, Mr. Theodule?
17 A Fifth.
18 Q Another entity over which you had control
19 and access to funds was the Elite Luxury Travel,
20 true, Mr. Theodule?
21 A Fifth.
22 Q Sir, I'm placing in front of you what
23 we'll mark as Exhibit 72 in this case. It's a
24 Florida Department of State, Division of
25 Corporations record and the electronic articles of

Page 45

1 organization for the Florida limited liability
2 company of Elite Luxury Travel, LLC, four-page
3 document. You are listed as a manager; is that
4 correct, Mr. Theodule?
5 A Fifth.
6 (Exhibit No. 72 was marked for
7 identification.)
8 BY MS. PAULOSE:
9 Q By the way, Mr. Theodule do you recognize
10 this address of 2295 Park Lake, Suite 190, Atlanta,
11 Georgia 30345?
12 A Fifth.
13 Q Another organization over which you had
14 control, Mr. Theodule, was Bliss Travel Management,
15 true, sir?
16 A Fifth.
17 (Exhibit No. 73 was marked for
18 identification.)
19 BY MS. PAULOSE:
20 Q Sir, I'm placing in front of you what
21 we'll mark as Exhibit 73 in this case, another
22 four-page document that includes a Florida
23 Department of State, Division of Corporations record
24 as well as the electronic articles of organization
25 for a Florida limited liability company, Bliss

Page 46

1 Travel Management, LLC.
2 Again, Mr. Theodule, you are listed as the
3 CEO of Bliss Travel Management, true, Mr. Theodule?
4 A Fifth.
5 Q Mr. Theodule, another entity over which
6 you had control related to CCC was Caribbean
7 Airways, LLC; is that true, Mr. Theodule?
8 A Fifth.
9 Q Placing in front of you what we will mark
10 as Exhibit 74 in this matter we have a Florida
11 Department of State, Division of Corporations record
12 and electronic articles of organization for the
13 Florida limited liability company Caribbean Airways,
14 LLC, true, Mr. Theodule?
15 A Fifth.
16 Q And you, sir, are listed as the manager or
17 member of this organization, true, sir?
18 A Fifth.
19 Q And the person listed as a vice president,
20 sir, if you'll look at the top of page 2, second
21 paragraph, is Dorothy Delisfort, true, Mr. Theodule?
22 A Fifth.
23 Q And Ms. Delisfort is your wife, true,
24 Mr. Theodule?
25 A Fifth.

Page 47

1 (Exhibit No. 74 was marked for
2 identification.)
3 BY MS. PAULOSE:
4 Q Sir, another organization over which you
5 had control and was related to CCC is Unity
6 Entertainment Group, Inc., true, Mr. Theodule?
7 A Fifth.
8 (Exhibit No. 75 was marked for
9 identification.)
10 BY MS. PAULOSE:
11 Q And placing in front of you what we'll
12 mark as Exhibit 75 in this case is a Florida
13 Department of State, Division of Corporations record
14 for Unity Entertainment Group, Inc., true,
15 Mr. Theodule?
16 A Fifth.
17 Q And, sir, you're listed as the registered
18 agent name -- I'm sorry. Under the registered agent
19 name and address is your name and the address for
20 the CCC home office, true, sir?
21 A Fifth.
22 (Exhibit No. 76 was marked for
23 identification.)
24 BY MS. PAULOSE:
25 Q Another entity over which you had control

Page 48

1 related to CCC was Reverse Home Loan, LLC, true,
2 Mr. Theodule?
3 A Fifth.
4 Q And placing in front of you, sir, what
5 we'll mark as Exhibit 76 in this case is a Florida
6 Department of State, Division of Corporations record
7 for Reverse Home Loan, LLC. You are listed as the
8 vice president of this organization, true,
9 Mr. Theodule?
10 A Fifth.
11 Q And the address listed there of 8461 Lake
12 Worth Road is the same address that you described to
13 me earlier as the home office of CCC, true?
14 A Fifth.
15 (Exhibit No. 77 was marked for
16 identification.)
17 BY MS. PAULOSE:
18 Q Sir, another entity related to CCC over
19 which you had control was Good Buy Homes, correct,
20 sir?
21 A Fifth.
22 Q Do you need a moment, Mr. Theodule?
23 A No.
24 Q Sir, I'm placing in front of you what
25 we'll mark as Exhibit 77. This is a Florida

Page 49

1 Department of State, Division of Corporations record
2 and followed by the articles of incorporation of
3 Good Buy Homes. Did I describe that accurately,
4 Mr. Theodule?
5 A Fifth.
6 Q And this is the Florida Department of
7 State, Division of Corporations record. You're
8 listed here, sir, directing your attention to page
9 2, as an officer, director of this organization,
10 Good Buy Homes, Inc., true, Mr. Theodule?
11 A Fifth.
12 Q And the person who is the registered agent
13 is listed as Yolette Williams, true, Mr. Theodule?
14 A Fifth.
15 Q And Ms. Williams is your sister, correct,
16 Mr. Theodule?
17 A Fifth.
18 Q Mario Theodule is listed as another
19 officer, director, another one of your relatives,
20 true, Mr. Theodule?
21 A Fifth.
22 (Exhibit No. 78 was marked for
23 identification.)
24 BY MS. PAULOSE:
25 Q Okay. You were also affiliated with an

Page 50

1 organization named Wow! We May Double, true,
2 Mr. Theodule?
3 A Fifth.
4 Q Placing in front of you what we'll mark as
5 Exhibit 78, Mr. Theodule. This was an organization
6 set up by Kathryn Parker who was the head of SIMS,
7 true, Mr. Theodule?
8 A Fifth.
9 Q And Kathryn Parker was your employee,
10 true, Mr. Theodule?
11 A Fifth.
12 Q She set up this organization with your
13 aid, true, Mr. Theodule?
14 A Fifth.
15 Q And the name, in fact, is the direct
16 reference to the promises you were making to
17 investors to double their money, true, Mr. Theodule?
18 A Fifth.
19 (Exhibit No. 79 was marked for
20 identification.)
21 BY MS. PAULOSE:
22 Q Sir, I am placing in front of you what
23 we'll mark as Exhibit 79. It's the Florida
24 Department of State, Division of Corporations record
25 for Early Views, Inc. Do you recognize that name,

Page 51

1 Mr. Theodule?
2 A Fifth.
3 Q This is another organization that you
4 helped fund with CCC money, true, Mr. Theodule?
5 A Fifth.
6 Q And Early Views, Inc., was also run by
7 your employee, Kathryn Parker, true, Mr. Theodule?
8 A Fifth.
9 Q And Ms. Parker is listed as an officer,
10 director of this organization, true, Mr. Theodule?
11 A Fifth.
12 Q Okay. Sir, I'm placing in front of you a
13 document that's been previously marked in this case
14 as Exhibit No. 9. This is labeled "Creative Capital
15 Consortium Business Plan, Wellington, Florida." Did
16 I read that accurately, Mr. Theodule?
17 A Fifth.
18 Q Mr. Theodule, if I may direct your
19 attention to the third page of this document where
20 it says, "1.0 Executive Summary."
21 The first sentence says, "Creative Capital
22 Consortium is a Wellington, Florida based venture
23 capital limited liability company specializing in
24 seeding startup companies and providing support to
25 new ideas." Did I read that correctly,

Page 52

1 Mr. Theodule?
2 A Fifth.
3 Q And the last sentence of that paragraph
4 reads, "However, CCC recognizes that alongside this
5 greater risk there is also a potential for a greater
6 return." Did I read that correctly, Mr. Theodule?
7 A Fifth.
8 Q This was a document that you directed
9 Ms. Parker to help prepare based on information that
10 she had gotten from you and others; is that true,
11 Mr. Theodule?
12 MR. WEIGEL: Objection. Misstates
13 evidence.
14 THE WITNESS: Fifth.
15 BY MS. PAULOSE:
16 Q And, then, Mr. Theodule, you used her
17 draft and disseminated this business plan to other
18 employees, true, sir?
19 MR. WEIGEL: Objection. Misstates
20 evidence.
21 THE WITNESS: Fifth.
22 BY MS. PAULOSE:
23 Q And your employees used this as a basis
24 for the promises that they made which were based in
25 turn on statements that you made; is that true,

Page 53

1 Mr. Theodule?
2 MR. WEIGEL: Objection. Misstates
3 evidence.
4 THE WITNESS: Fifth.
5 BY MS. PAULOSE:
6 Q Sir, if you could turn to the next page
7 under "1.1 Objectives." Do you see there's a graph
8 there, and under the graph, the fourth objective is
9 listed as "to maintain and grow the total income for
10 subsequent years at a rate of 50 to 60 percent
11 annually"? Did I read that correctly, Mr. Theodule?
12 A Fifth.
13 Q Mr. Theodule, did you have any factual
14 basis for claiming that CCC could maintain and grow
15 the total income for subsequent years at a rate of
16 50 to 60 percent annually?
17 MR. WEIGEL: Objection. No
18 foundation. Misstates evidence.
19 THE WITNESS: Fifth.
20 BY MS. PAULOSE:
21 Q In fact, you didn't have any basis for
22 making this statement, did you, Mr. Theodule?
23 MR. WEIGEL: Objection. Misstates
24 evidence.
25 THE WITNESS: Fifth again.

Page 54

1 BY MS. PAULOSE:
2 Q Sir, if you'll look under the section that
3 says, "1.3 Keys to Success. Always hire and employ
4 highly trained individuals with a keen insight into
5 various forms of investing." Did I read that
6 correctly?
7 A Fifth.
8 Q Sir, did CCC hire and employ highly
9 trained individuals with a keen insight into various
10 forms of investing?
11 A Fifth.
12 Q In fact, no one at CCC had a keen insight
13 into various forms of investing, true, Mr. Theodule?
14 MR. WEIGEL: Objection. Misstates
15 evidence.
16 THE WITNESS: Fifth.
17 BY MS. PAULOSE:
18 Q Sir, if you would please turn to the next
19 page under "2.1 Company Ownership." It says,
20 "George Louis Theodule is the President and CEO of
21 Creative Capital Consortitum, LLC. Mr. Theodule
22 brings over 25 years experience in the world of
23 finance and sales. He also served as the Finance
24 Director of several large companies and has
25 significant expertise in sales. As the sole

Page 55

1 proprietor of CCC, Mr. Theodule brings over 20 years
2 experience as an investor in the stock market and
3 other business ventures." Did I read that
4 correctly, Mr. Theodule?
5 A Fifth.
6 Q So you were the president and CEO of CCC,
7 correct?
8 A Fifth.
9 Q Is it a true statement, Mr. Theodule, that
10 you had 25 years experience in the world of finance
11 and sales?
12 A Fifth.
13 Q Is it a true statement, Mr. Theodule, that
14 you served as the finance director of several large
15 companies, sir?
16 A Fifth.
17 Q Could you describe those companies to me?
18 A Fifth.
19 Q Is it a true statement that you had
20 significant expertise in sales?
21 A Fifth.
22 Q Could you describe that expertise to me?
23 A Fifth.
24 Q Again, you're described as the sole
25 proprietor of CCC, correct, Mr. Theodule?

Page 56

1 A Fifth.
2 Q Mr. Theodule, is it true that you had over
3 20 years experience as an investor in the stock
4 market and other business ventures?
5 A Fifth.
6 Q Could you please describe that experience
7 for me?
8 A Fifth.
9 Q And, sir, turning about five or six pages
10 in where it says "5.0. Strategy and Implementation
11 Summary." There we go. Under point number 1 it
12 says, "Build a relationship-oriented business.
13 Build long-term relationships with small business
14 owners, partners and accredited investors in our
15 area to achieve a long-term sustainable method of
16 referrals for our services and vice versa."
17 Did I read that accurately, Mr. Theodule?
18 A Fifth.
19 Q Did CCC successfully build long-term
20 relationships with small business owners, partners,
21 and accredited investors, Mr. Theodule?
22 A Fifth.
23 Q Did CCC achieve a long-term sustainable
24 method of referrals?
25 A Fifth.

Page 57

1 Q Sir, could you describe to me what an
2 accredited investor is?
3 A Fifth.
4 Q And, in fact, were the vast majority of
5 the people investing in CCC accredited investors?
6 A Fifth.
7 Q In fact, the vast majority of the people
8 investing in CCC were people from humble means,
9 true, Mr. Theodule?
10 A Fifth.
11 MR. WEIGEL: Objection. Misstates
12 evidence.
13 BY MS. PAULOSE:
14 Q Sir, if you could please turn three pages
15 in under 5.3.1 Investment Forecast. There we go.
16 Reading the second paragraph, it says, "The
17 investment growth is charted beginning with a 15
18 percent appointment booking rate for the first month
19 and a swift monthly growth for the first six months
20 of approximately 35 percent bookings per month
21 reaching a maximum booking rate of 66 percent by the
22 12th month. Forecasting for future years should be
23 comprised of similar or slightly higher booking
24 rates as the final month of the year projections.
25 This depends on the market conditions."

Page 58

1 Did I read that accurately, sir?
2 A Fifth.
3 Q Sir, what basis did CCC have for making
4 these booking predictions?
5 A Fifth.
6 Q In fact, there was no factual basis for
7 these statements, was there, Mr. Theodule?
8 A Fifth.
9 Q Sir, if you could please turn to the next
10 page. It has two tables. And it describes the
11 investment forecast. And it goes on to read that
12 the average investment in 2008 is \$100,000 and the
13 average investment in 2009 is \$250,000. Did I read
14 that accurately?
15 A Fifth.
16 Q Mr. Theodule, is that a correct and
17 truthful description of the average investment in
18 CCC?
19 A Fifth.
20 Q Sir, if you could turn three pages in
21 under 7.0 Management Summary. The last sentence of
22 the first paragraph says, "His proven leadership
23 abilities coupled with his experience as a
24 successful entrepreneur make him uniquely qualified
25 to lead Creative Capital Consortium."

Page 59

1 Could you talk to me, sir, about your
2 leadership abilities and your experience as an
3 entrepreneur?
4 A Fifth.
5 Q Sir, is the description of any of these
6 other people listed on this page accurate?
7 A Fifth.
8 Q Did any of these other people have any
9 significant investment or financial background?
10 A Fifth.
11 Q Sir, if you could turn three pages in now
12 to Section 8.3, Projected Profit and Loss. There we
13 go. The paragraph reads, "The most important item
14 to note in the profit and loss projections is that
15 with only a modest increase in our month to month
16 investment opportunities we should experience
17 tremendous growth in our overall profit margins."
18 Did I read that correctly, Mr. Theodule?
19 A Fifth.
20 Q Mr. Theodule, did CCC have any basis for
21 making this projection?
22 A Fifth.
23 Q Did CCC, in fact, experience tremendous
24 growth in profit margins?
25 A Fifth.

Page 60

1 Q Sir, looking at paragraph 8.4, Projected
2 Cash Flow, just further down the page, the second
3 sentence reads, "In spite of these conservative
4 numbers, we will achieve a positive cash flow very
5 quickly." Did I read that accurately?
6 A Fifth.
7 Q Sir, did CCC have any factual basis for
8 making this prediction?
9 A Fifth.
10 Q And, in fact, did CCC achieve a positive
11 cash flow very quickly?
12 A Fifth.
13 Q Sir, directing your attention to a
14 slide -- may I help you. It reads "Joining New
15 Members." You want to go probably about ten pages
16 in or so.
17 A Okay.
18 Q Keep going.
19 A Okay.
20 Q There we go. Sir, the slide reads
21 "Joining New Members." And then it says, "Each
22 Packet Contains," and it lists -- one, two, three,
23 four, five, six, seven -- eight bullets. And it
24 even describes which side, right side and left side,
25 these materials should be placed under. Did I

Page 61

1 describe this page accurately?
2 A Fifth.
3 Q And it includes materials including an
4 opening checklist, a membership application, club
5 bylaws, club partnership, breach of partnership
6 agreement; is that true?
7 A Fifth.
8 Q This was part of the script that CCC gave
9 to employees to recruit in new investors, true, sir?
10 A Fifth.
11 Q And it was part of the control that CCC
12 exercised over investment clubs, true, Mr. Theodule?
13 A Fifth.
14 Q And part of that control included
15 directing everything from a membership application
16 to the form of the receipt that an investor would
17 receive, true, Mr. Theodule?
18 A Fifth.
19 Q Sir, if you could turn to the next page
20 where it says "Third Party Verification." And it
21 lists that phone number of 877-355-SIMS. Did I read
22 that accurately?
23 A Fifth.
24 Q This, again, was a portrayal that you made
25 to investors that their funds would be independently

Page 62

1 verified by a third party, true, Mr. Theodule?
2 A Fifth.
3 Q That was not an accurate representation to
4 investors, was it, Mr. Theodule?
5 A Fifth.
6 Q Sir, I'm placing in front of what you
7 we've previously marked in this case as Exhibit 11.
8 Exhibit 11 is a forwarded e-mail from Berthrum
9 Brewster to Linda Schmidt on Friday, September 26,
10 2008 dated -- or timed, I should say, at 5:52 p.m.
11 It includes these attachments: Investment
12 club bylaws and operating procedures, investment
13 club general partnership agreement, guidelines for
14 compliance with club rules, membership application,
15 opening check list, deposit receipt, UPC welcome,
16 your invitation to financial freedom, script for
17 club presentations, withdrawal request.
18 Did I describe this document and the
19 attachments accurately according to this e-mail,
20 sir?
21 A Fifth.
22 Q And this message was forwarded from
23 kathryn@igotsims.com, describes herself as Kathryn
24 Parker, true, sir?
25 A Fifth.

Page 63

1 Q Kathryn Parker put together these
2 materials based on your instructions, true,
3 Mr. Theodule?
4 A Fifth.
5 Q And these were the guidelines that you
6 gave out to the investment clubs for how to operate
7 their clubs and deal with investors, true,
8 Mr. Theodule?
9 A Fifth.
10 Q And, sir, if you could please turn to the
11 second page of this document. It says "Investment
12 Club Bylaws and Operating Procedures." Did I read
13 that accurately, sir?
14 A Fifth.
15 Q This was the template that you gave to
16 each club as part of the control that CCC exercised
17 under the investment clubs, true, Mr. Theodule?
18 A Fifth.
19 Q And you did this because it was very
20 important for you to standardize how you and CCC
21 were dealing with the clubs, true, Mr. Theodule?
22 A Fifth.
23 Q You made a number of statements in this
24 document to give investors confidence about their
25 investments, true, Mr. Theodule?

Page 64

1 A Fifth.
2 Q But nobody did anything to verify or
3 enforce those promises, true, Mr. Theodule?
4 A Fifth.
5 Q Sir, if you could please turn four pages
6 in. Actually, at the bottom of the page it says
7 page number 5. The second full bullet says,
8 "Compliance: The Executive Committee shall act to
9 ensure that the Club remains in compliance with all
10 SEC and state laws regulating investment clubs and
11 that the Partnership Agreements and these Bylaws, as
12 may be amended from time to time, are enforced."
13 Did I read that accurately?
14 A Fifth.
15 Q Did, in fact, the clubs or CCC comply with
16 various laws and regulations, sir?
17 A Fifth.
18 Q Did anyone do anything to ensure that the
19 clubs and CCC would enforce or comply with
20 applicable regulations and laws?
21 A Fifth.
22 Q No one did anything and -- no one in
23 charge of CCC did anything to enforce this clause,
24 true, Mr. Theodule?
25 A Fifth.

Page 65

1 Q Sir, if you could turn to the next page,
2 Article VII. It says "Officers' Duties," and then
3 it goes on to list duties for the president, the
4 vice president, the treasurer, the first secretary,
5 and the second secretary, true, Mr. Theodule?
6 A Fifth.
7 Q And, again, this was part of the control
8 that CCC was extending over the investment clubs to
9 regulate who the officers would be and what
10 functions they would perform; is that true,
11 Mr. Theodule?
12 A Fifth.
13 Q But nobody from CCC did anything to ensure
14 that any of these officers were actually complying
15 with their duties, true, Mr. Theodule?
16 A Fifth.
17 Q Sir, if you could please turn to page 9 of
18 this document, Article XII, Conflict of Interest.
19 Sir, the first bullet reads, "A conflict of interest
20 real, potential, or perceived exists when a Member
21 or Officer has a personal or familial interest that
22 may influence the Member when making decisions for
23 or about the Club, its activities, investments, or
24 hiring of vendors." Did I read that accurately?
25 A Fifth.

Page 66

1 Q And, sir, the purpose of putting this in
2 was to give investors a certain level of confidence
3 that their investments would be -- would be dealt
4 with in an ethical manner, true?
5 A Fifth.
6 Q But, in fact, this clause was not enforced
7 by you or anyone else, was it, Mr. Theodule?
8 A Fifth.
9 Q Numerous conflicts of interest existed at
10 CCC, true, Mr. Theodule?
11 A Fifth.
12 Q And, in fact, many of your family members
13 and friends and associates had conflicts of interest
14 at CCC, true, Mr. Theodule?
15 A Fifth.
16 Q And you, too, personally had conflicts of
17 interest at CCC, true, Mr. Theodule?
18 A Fifth.
19 Q Sir, if you could turn to the next page,
20 page 10. The first full bullet says, "The Club
21 shall establish a Code of Ethics as part of the
22 Club's Bylaws and this Code of Ethics shall be part
23 of the new Member enrollment packet and signed by
24 the Member." Did I read that accurately?
25 A Fifth.

Page 67

1 Q Did, in fact, any of the club set up a
2 code of ethics?
3 A Fifth.
4 Q Do you know if anyone -- if anyone,
5 including you, at CCC did anything to enforce a code
6 of ethics?
7 A Fifth.
8 Q Sir, if you could turn three pages in to
9 the document labeled "Partnership Agreement."
10 Mr. Theodule, this is the template that you gave to
11 investment clubs to follow when setting up clubs,
12 true?
13 A Fifth.
14 Q And you did this because you wanted the
15 clubs to be standardized in their dealings, true,
16 Mr. Theodule?
17 A Fifth.
18 Q Sir, if you would turn to the next
19 document included in this package. It's about
20 probably eight pages in. It says "Club Guidelines
21 for Compliance with Club Rules." There you go.
22 This document purported to set up more ethical
23 standards for clubs, true, Mr. Theodule?
24 A Fifth.
25 Q And, again, the purpose of this was to

Page 68

1 lull investors into thinking that their money was
2 safe, true, Mr. Theodule?
3 MR. WEIGEL: Objection. Misstates
4 evidence.
5 THE WITNESS: Fifth.
6 BY MS. PAULOSE:
7 Q Sir, if you could turn to the next page.
8 The first full paragraph reads, "Although the
9 Compliance Committee shall have broad discretion in
10 determining compliance with and violations of Club
11 Rules, examples of conduct by a Member that shall be
12 sufficient to suspend and/or terminate a Member's
13 membership status in the Club are as follows:
14 "1. Theft of property, assets, services
15 or money from the Club;
16 "2. Fraud, including but not limited to
17 improper use of Club Name, Tax Identification
18 number, or assets of the Club for purpose of
19 self-dealing or gain."
20 Did I read that accurately?
21 A Fifth.
22 Q Sir, do you know if any compliance
23 committees were, in fact, set up?
24 A Fifth.
25 Q And do you know if anyone, including

Page 69

1 yourself, at CCC enforced these clauses?
2 A Fifth.
3 Q Sir, did CCC employees or investment club
4 presidents steal property, assets, services, or
5 money from clubs?
6 A Fifth.
7 Q Did you steal property, assets, services,
8 or money from the clubs?
9 A Fifth.
10 Q Did CCC employees engage in fraud?
11 A Fifth.
12 Q Did you engage in fraud?
13 A Fifth.
14 Q Sir, if you could turn now three pages in
15 to the next document. It says "Membership
16 application." Did I read that correctly?
17 A Fifth.
18 Q And the next page says "Opening
19 Checklist," and the next page is a deposit receipt;
20 is that true, sir?
21 A Fifth.
22 Q And all of these, again, were your efforts
23 to standardize how the clubs would be dealing with
24 investors; is that true, sir?
25 A Fifth.

Page 70

1 Q Now, we'll want to turn another probably
2 six or seven pages in to a chart graph that says
3 "Our Past Performance." There we go.
4 This is a graph, and the title of the
5 graph is "Our Past Performance, Return on
6 Investment." Did I read that accurately, sir?
7 A Fifth.
8 Q This was what you were promising
9 investors, true, Mr. Theodule?
10 A Fifth.
11 Q And this was based on promises that you
12 personally made, true, sir?
13 A Fifth.
14 Q And those promises were repeated by other
15 CCC employees, true, sir?
16 A Fifth.
17 Q What this depicts in pictorial form was
18 what you were orally or by e-mail or other
19 communications telling investors, true,
20 Mr. Theodule?
21 A Fifth.
22 Q So this chart depicts a growth rate of an
23 investment of \$20,000 in October of 2007, true?
24 A Fifth.
25 Q Doubling to \$40,000 by January of 2008,

Page 71

1 true?
2 A Fifth.
3 Q And so what you were claiming was that CCC
4 could double people's money in a quarter, true,
5 Mr. Theodule?
6 MR. WEIGEL: Objection. Misstates
7 evidence.
8 THE WITNESS: Fifth.
9 BY MS. PAULOSE:
10 Q And, in fact, was there any factual basis
11 for this chart?
12 A Fifth.
13 Q That was not an accurate depiction of
14 CCC's past performance, was it, sir?
15 A Fifth.
16 Q Nor was it an accurate predictor of
17 returns on investments, true, Mr. Theodule?
18 A Fifth.
19 Q But CCC employees knowing this and you
20 knowing this was false continued to convey this to
21 investors, true, Mr. Theodule?
22 MR. WEIGEL: Objection. Misstates
23 evidence.
24 THE WITNESS: Fifth.
25 BY MS. PAULOSE:

Page 72

1 Q Sir, I am --
2 A Can I borrow your highlighter?
3 Q Certainly.
4 A Thank you.
5 Q Sir, I'm placing in front of you what
6 we'll mark as Exhibit 80. This is an e-mail from
7 Monia Shields to a number of people, including you
8 at your georgetheodule@yahoo.com address. The
9 subject is "Forward: List of contacts." The date is
10 Monday, July 21st, 2008 at 11:23 a.m. Did I
11 describe that accurately?
12 A Fifth.
13 Q It has a list of contacts for the CCC
14 operations, true, Mr. Theodule?
15 A Fifth.
16 Q You personally received this e-mail, true,
17 Mr. Theodule?
18 A Fifth.
19 Q As did a number of people, including Magda
20 Dominique and Roger Terma, who are two of the last
21 four recipients on this e-mail, true, Mr. Theodule?
22 A Fifth.
23 Q All these folks were people with whom you
24 dealt with and supervised or were supposed to
25 supervise on a regular basis, true, Mr. Theodule?

Page 73

1 A Fifth.
2 Q And these were the employees of CCC, true,
3 Mr. Theodule?
4 A Fifth.
5 (Exhibit No. 80 and 81 were marked for
6 identification.)
7 BY MS. PAULOSE:
8 Q Mr. Theodule, I'm placing in front of you
9 what we'll mark as Exhibit 81 in this case. This
10 has giant block letters saying "Agenda." It's
11 another e-mail from mdfrezin@aol.com. That's Magda
12 Dominique, true, Mr. Theodule?
13 A Fifth.
14 Q And it's to a number of people, including
15 you at georgetheodule@yahoo.com. It's dated
16 Wednesday, July -- I'm sorry -- June 25th, 2008.
17 And the attachments include agenda for president
18 meeting. Did I describe that accurately, sir?
19 A Fifth.
20 Q This includes a series of e-mails that you
21 became aware of through Magda Dominique, true,
22 Mr. Theodule?
23 A Fifth.
24 MR. WEIGEL: Objection. Misstates
25 evidence.

Page 74

1 BY MS. PAULOSE:
2 Q I suppose it's true that you became aware
3 of it through other means as well, true,
4 Mr. Theodule?
5 A Fifth.
6 Q Sir, at some point you became aware that
7 investors were becoming very upset with the fact
8 that they were not getting the promised returns on
9 their investments, true, sir?
10 A Fifth.
11 Q And investors were regularly calling the
12 CCC offices and demanding their money back from
13 employees and club presidents, true, sir?
14 A Fifth.
15 Q And at some point the staff tried to
16 curtail some of that communication, true,
17 Mr. Theodule?
18 A Fifth.
19 Q And so when it says here under 3(a)
20 Communication -- sir, I'm on the first page now.
21 The very first page. Where it says, "CCC and club
22 officers (only officers should have direct contact
23 with CCC)", that's a reference to the fact that
24 there was a deluge of complaints from investors,
25 true, Mr. Theodule?

Page 75

1 A Fifth.
2 MR. WEIGEL: Objection. Misstates
3 evidence.
4 BY MS. PAULOSE:
5 Q And this exhibit continues to -- includes
6 a number of other communications that documents some
7 of the issues, true, Mr. Theodule?
8 A Fifth.
9 Q So if you turn to the next page, sir, it
10 says, "Hi, Magda. By the way, conference was great
11 and admirable. You made it sound so blissful and
12 prosperous by putting everyone ahead of his or her
13 expectations that you almost took my breath away,
14 quite frankly." Did I read that accurately?
15 A Fifth.
16 Q Why was Magda Dominique at a time when
17 there were significant financial problems making the
18 club still sound so "blissful and prosperous,"
19 Mr. Theodule?
20 A Fifth.
21 MR. WEIGEL: Objection as to form.
22 BY MS. PAULOSE:
23 Q Were you continuing to give her those
24 instructions, Mr. Theodule?
25 A Fifth.

Page 76

1 Q Now, it goes on to say that a "Month ago I
2 got invited by George to a meeting in Okeechobee.
3 He did the presentation himself that day. He talked
4 about a type of credit restoration form which I've
5 been trying to get my hands on all that time." Did
6 I read that accurately?
7 A Fifth.
8 Q At this time you were still personally
9 making presentations to investors, true,
10 Mr. Theodule?
11 A Fifth.
12 Q And you were still personally making
13 promises of doubling people's money in 90 days,
14 true, sir?
15 A Fifth.
16 MR. WEIGEL: Objection. Misstates
17 evidence.
18 BY MS. PAULOSE:
19 Q And you had personal access to funds and
20 monies of CCC investor money, true, sir?
21 A Fifth.
22 Q Sir, if you'll turn to the next page.
23 It's another e-mail and it describes the chart.
24 Directing your attention to the second
25 chart, it says "Deposited to CCC \$323,820," that it

Page 77

1 lists as going into George's account. Did I read
2 that accurately?
3 A Fifth.
4 Q You also got another \$10,800 that was
5 described as going into your account, correct,
6 Mr. Theodule?
7 A Fifth.
8 Q If you turn to the next page -- I see
9 you're there -- it also describes you as having
10 multiple other deposits; is that true, Mr. Theodule?
11 A Fifth.
12 Q At this time, though, you knew that
13 investors were calling and demanding their money
14 back, true, Mr. Theodule?
15 A Fifth.
16 Q But CCC didn't have the ability to give
17 their money back because the money was being stolen
18 or lost, true, Mr. Theodule?
19 A Fifth.
20 Q If we turn to the next page, sir, there's
21 an e-mail -- okay. You're there. It says from
22 Advent Investment Club, sent Friday, July 25th, 2008
23 at 12:47 p.m. It's to Magda Dominique.
24 Sir, if I could direct your attention to
25 the last three full sentences of that first

Page 78

1 paragraph. It says, "We can talk about that later
2 on, but the main reason why I'm sending you this
3 e-mail is because my clients are calling regarding
4 the update on their accounts. Some of them reach
5 their maturity date on 7/23 and would like to see
6 their \$ has indeed doubled so they can invest much
7 more \$."
8 Did I read that accurately, Mr. Theodule?
9 A Fifth.
10 Q Where did people get -- where did these
11 investors get this idea that their money would
12 double?
13 MR. WEIGEL: Objection. Calls for
14 speculation.
15 THE WITNESS: Fifth.
16 BY MS. PAULOSE:
17 Q It's true, Mr. Theodule, that they got
18 that idea because that's what you told them, true,
19 sir?
20 A Fifth.
21 Q And that's what other CCC employees,
22 including Ms. Dominique, told them, true?
23 A Fifth.
24 Q And so multiple members were demanding
25 that they get their money doubled as you had

Page 79

1 promised, including Reginald Gousse, Joseph
2 Seraphin, Jean Joseph, the General Association of
3 DSDA, Theisha McClashie, Carroll Nazaire, Phadine
4 Louis, Sheila Nazaire, and Isabelle Martin, true,
5 Mr. Theodule?
6 A Fifth.
7 Q And you were aware of this at this time,
8 true, Mr. Theodule?
9 A Fifth.
10 Q You were also aware that there were rumors
11 that CCC was going to collapse because of the
12 financial misappropriation, true, Mr. Theodule?
13 A Fifth.
14 Q If you turn to the next page -- I think
15 you're there -- it says, "Hello Mireille/Magda. How
16 are you? How was your weekend?"
17 "The following account are requesting for
18 their account to be closed ASAP due to much rumors
19 that they'd heard and truly does not want or trust
20 their monies to be with our club/CCC."
21 Did I read that accurately, sir?
22 A Fifth.
23 Q So investors were continuing to demand
24 their money back, true, Mr. Theodule?
25 A Fifth.

Page 80

1 Q And it's a true statement that you were
2 setting up the rules about how much money people had
3 to invest, what sort of deductions were taken, what
4 sort of fees were made? You were the one who
5 controlled all of that, right, Mr. Theodule?
6 A Fifth.
7 Q Sir, if you could turn to the next page.
8 There's an e-mail from a jackie@n2ccc.com to Magda
9 Dominique. It forwards an account balance on
10 Monday, June 16th, 2008. Did I describe that
11 accurately?
12 A Fifth.
13 Q And then it goes on to forward another
14 e-mail. And the second e-mail says, "The balance on
15 mine is supposed to be \$27,000 and his (Robert
16 Vargas) \$3,000 only if Magda went by George
17 Theodule's rule regarding the 20 percent deduction."
18 Did I read that accurately, sir?
19 A Fifth.
20 Q And she refers to it as George Theodule's
21 rule because you set the rules for CCC, true,
22 Mr. Theodule?
23 A Fifth.
24 Q You set the rules that governed the
25 investment clubs and how investors could -- if and

Page 81

1 when they got their money back, true, Mr. Theodule?
2 MR. WEIGEL: Objection. Compound.
3 Misstates evidence.
4 THE WITNESS: Fifth.
5 BY MS. PAULOSE:
6 Q Sir, if you could turn to the next page.
7 There's another e-mail. And the second -- no.
8 Third sentence says, "From now on, I will not give
9 your number away to my members. I will be the one
10 contacting you when a withdrawal request is placed.
11 However, I really need your help today. Jean Ronald
12 has threatened to contact his lawyer if he does not
13 receive his money tomorrow." Did I read that
14 accurately?
15 A Fifth.
16 Q Investors were calling and threatening
17 legal action because they were so unhappy with the
18 fact that their money was not being doubled in 90
19 days, true, Mr. Theodule?
20 A Fifth.
21 MR. WEIGEL: Objection. Misstates
22 evidence.
23 BY MS. PAULOSE:
24 Q Sir, you became aware that the situation
25 was quite dire in at least the summer of 2008, true,

Page 82

1 Mr. Theodule?
2 A Fifth.
3 Q I see you're at the next page already. It
4 has an agenda for a meeting at the Crown Ambassador
5 Investment Club, LLC on September 16th, 2008 at
6 11 a.m.
7 The first indented bullets describe
8 banking problems. What were these banking problems,
9 Mr. Theodule?
10 A Fifth.
11 Q The next series of indented bullets
12 describes a lack of liquidity due to the CCC current
13 financial situation. What was the CCC current
14 financial situation?
15 A Fifth.
16 Q And then it describes threats to our
17 personal life, managing members. What kind of
18 threats were being made to people's personal lives?
19 A Fifth.
20 Q Investors were calling and some of them
21 were making threats because they were so unhappy
22 that promises had not been fulfilled, true,
23 Mr. Theodule?
24 A Fifth.
25 Q Sir, how many investors did you personally

Page 83

1 meet?
2 A Fifth.
3 Q How many investors did you personally
4 speak to?
5 A Fifth.
6 Q Do you know who else spoke to investors
7 about CCC?
8 A Fifth.
9 Q Do you know about the control -- I'm
10 sorry. It's a fact that you personally spoke to
11 many, many investors, true, Mr. Theodule?
12 A Fifth.
13 Q And it's a fact that CCC controlled the
14 investment clubs, true, Mr. Theodule?
15 MR. WEIGEL: Objection. Misstates
16 evidence.
17 THE WITNESS: Fifth.
18 BY MS. PAULOSE:
19 Q And it's a fact that not one penny of any
20 investment club money went anywhere but to CCC,
21 true, Mr. Theodule?
22 A Fifth.
23 MR. WEIGEL: Objection. Misstates
24 evidence.
25 BY MS. PAULOSE:

Page 84

1 Q It's also a fact, sir, that you guaranteed
2 investors you would double their money in 90 days,
3 true, Mr. Theodule?
4 A Fifth.
5 Q It's a fact that you never made a trading
6 profit, true, Mr. Theodule?
7 MR. WEIGEL: Objection. Misstates
8 evidence.
9 BY MS. PAULOSE:
10 Q Mr. Theodule, on or about December 7,
11 2007, did you hold a meeting at the CCC offices on
12 Lake Worth Road in Lake Worth, Florida?
13 A Fifth.
14 Q Magda Dominique attended this meeting with
15 you, true, Mr. Theodule?
16 A Fifth.
17 Q You gave out a phone number of
18 1-866-PAY2YOU at this meeting, correct,
19 Mr. Theodule?
20 A Fifth.
21 Q You claimed at this meeting that you
22 invested in well-known companies, such as John
23 Deere, Best Buy, Monsanto, Google, and GameStop,
24 correct, Mr. Theodule?
25 A Fifth.

Page 85

1 Q Was that a true statement, sir?
2 A Fifth.
3 Q You stated at this meeting on December 7,
4 2007 that investors were guaranteed never to lose
5 their initial investment after 90 days, true,
6 Mr. Theodule?
7 A Fifth.
8 Q Was that a true statement, Mr. Theodule?
9 A Fifth.
10 Q You stated at this meeting on
11 December 7th, 2007 that investments would double
12 every quarter, true, Mr. Theodule?
13 A Fifth.
14 Q Was that a true statement, Mr. Theodule?
15 A Fifth.
16 Q And you knew it was a false statement at
17 the time you made the statement, didn't you,
18 Mr. Theodule?
19 A Fifth.
20 MR. WEIGEL: Objection. Misstates
21 evidence.
22 BY MS. PAULOSE:
23 Q And, in fact, every time you guaranteed
24 investors that you'd double their money in 90 days,
25 you knew that was a false statement, didn't you,

Page 86

1 Mr. Theodule?
2 MR. WEIGEL: Objection. Misstates
3 evidence.
4 THE WITNESS: Fifth.
5 BY MS. PAULOSE:
6 Q You also claimed to have worked several
7 years in California for your own investment company
8 at the same meeting on December 7, 2007, true,
9 Mr. Theodule?
10 A Fifth.
11 Q Was that a true statement, Mr. Theodule?
12 A Fifth.
13 Q Now, investors came forward and invested
14 with CCC based on your representations on
15 December 7, 2007, correct, Mr. Theodule?
16 A Fifth.
17 Q And do you recall an investor named -- do
18 you need a moment, Mr. Theodule?
19 A No.
20 Q Okay.
21 A Thank you.
22 Q Do you remember an investor named William
23 P. Saborese, Mr. Theodule?
24 A Fifth.
25 Q Mr. Saborese was present at this meeting

Page 87

1 on December 7th, 2007, true, Mr. Theodule?
2 A Fifth.
3 Q And Mr. Saborese in particular invested a
4 thousand dollars with you that day, true,
5 Mr. Theodule?
6 A Fifth.
7 Q But others at this meeting invested as
8 much as \$10,000 or \$20,000, true, Mr. Theodule?
9 A Fifth.
10 Q You never doubled Mr. Saborese's money by
11 investing in the stock market, did you,
12 Mr. Theodule?
13 A Fifth.
14 Q And you did not double a single investor's
15 money in the stock market, did you, Mr. Theodule?
16 A Fifth.
17 Q To the extent that any investor got money
18 back, it was only because they were being paid with
19 a later investor's money, true, Mr. Theodule?
20 A Fifth.
21 Q It was not because their money was
22 profiting in the stock market, true, Mr. Theodule?
23 A Fifth.
24 Q Mr. Theodule, from what socioeconomic
25 group did most of your investors come?

Page 88

1 A Fifth.
2 Q You knew that many were not wealthy or
3 sophisticated investors, true, Mr. Theodule?
4 A Fifth.
5 Q You told people that you knew were
6 financially disadvantaged to entrust all their
7 assets to you, true, Mr. Theodule?
8 MR. WEIGEL: Objection. Misstates
9 evidence.
10 THE WITNESS: Fifth.
11 BY MS. PAULOSE:
12 Q Sir, do you remember an investor named
13 Evelyn Metellus?
14 A Fifth.
15 Q In December of 2007, you visited
16 Ms. Metellus's hair salon in Palm Beach, Florida,
17 true, Mr. Theodule?
18 A Fifth.
19 Q You visited Ms. Metellus to pressure her
20 to invest in CCC, true, Mr. Theodule?
21 MR. WEIGEL: Objection. Misstates
22 evidence.
23 THE WITNESS: Fifth.
24 BY MS. PAULOSE:
25 Q But you knew Ms. Metellus was not wealthy,

Page 89

1 true?
2 A Fifth.
3 Q And because you knew that she did not have
4 many assets, you asked her if she had any equity in
5 her home, true?
6 A Fifth.
7 Q You told Ms. Metellus to liquidate the
8 equity in her home to invest in CCC, true,
9 Mr. Theodule?
10 A Fifth.
11 Q You told Ms. Metellus you could double her
12 money every month without risk, true, Mr. Theodule?
13 A Fifth.
14 Q You told Ms. Metellus that if she gave you
15 \$150,000, it would double to \$300,000 the very next
16 month and then it would double again to \$600,000 the
17 second month, true, Mr. Theodule?
18 A Fifth.
19 Q You never told Ms. Metellus that there
20 were any risks to your investment strategy, did you,
21 sir?
22 A Fifth.
23 Q Nor did you discuss any fees associated
24 with this investment, did you, sir?
25 A Fifth.

Page 90

1 Q Ms. Metellus did not, in fact, invest with
2 you that particular day in December, did she, sir?
3 A Fifth.
4 Q So you came back in June of 2008 and you
5 told Ms. Metellus that she'd made a mistake in not
6 investing with CCC, true, Mr. Theodule?
7 A Fifth.
8 Q You said this to pressure her to invest
9 with you, true, sir?
10 A Fifth.
11 Q You told her you had already made a large
12 number of people millionaires since your first
13 conversation with Ms. Metellus, true, Mr. Theodule?
14 A Fifth.
15 Q In June of 2008, you told Ms. Metellus
16 that you could double her money by investing it in
17 CCC, but this time you told her it would take her
18 three months to double her money, true?
19 A Fifth, Fifth, Fifth, Fifth.
20 Q Again, you did not tell Ms. Metellus of
21 any risk to her money, did you, sir?
22 A Fifth.
23 Q You did not tell Ms. Metellus of any fees
24 associated with the investment, did you, sir?
25 A Fifth.

Page 91

1 Q This time, however, Ms. Metellus did
2 invest with you, true, Mr. Theodule?
3 A Fifth.
4 Q And, in fact, she liquidated the equity in
5 her home to invest with CCC, true, Mr. Theodule?
6 A Fifth.
7 Q And one of your club presidents, Brutus
8 Toussaint, personally escorted Ms. Metellus to the
9 Bank of America to withdraw \$40,000 on June 26,
10 2008, true, Mr. Theodule?
11 A Fifth.
12 Q And, in fact, you lost or stole all of
13 Ms. Metellus's money, true, Mr. Theodule?
14 A Fifth.
15 Q And to this day, neither you nor anyone
16 else at CCC has given Ms. Metellus a dime of her
17 money back, true?
18 A Fifth.
19 Q Sir, you personally met with an investor
20 named Angela Telasco, true?
21 A Fifth.
22 Q You met Ms. Telasco personally in April
23 2008 at your offices in Lake Worth, true?
24 A Fifth.
25 Q You met with her about a total of seven

Page 92

1 times, correct?
2 A Fifth.
3 Q You told Ms. Telasco face-to-face about
4 your general investment strategy, true?
5 A Fifth.
6 Q But you refused to give her any specifics,
7 true?
8 A Fifth.
9 Q You told her that you had 17 years
10 experience in investing, true?
11 A Fifth.
12 Q Was that a true statement, Mr. Theodule?
13 A Fifth.
14 Q You told Ms. Telasco that you were
15 investing in hotels in Orlando, true?
16 A Fifth.
17 Q You told Ms Telasco that you were
18 investing in business projects in Sierra Leone,
19 Swaziland, and Jamaica, true?
20 A Fifth.
21 Q You told Ms. Telasco that you were
22 investing in business opportunities, including an
23 airline, an import-export business, and other
24 businesses, true?
25 A Fifth.

Page 93

1 Q You told Ms. Telasco that you were working
2 on getting diplomatic immunity from Sierra Leone,
3 true?
4 A Fifth.
5 Q Was that a true statement, Mr. Theodule?
6 A Fifth.
7 Q You made this representation about
8 diplomatic ties to other entities and individuals as
9 well, didn't you, Mr. Theodule?
10 A Fifth.
11 Q You told Ms. Telasco that she put her
12 trust in you, true?
13 A Fifth.
14 Q You told Ms. Telasco that you guaranteed
15 the safety of her investment, true?
16 A Fifth.
17 Q You promised to double Ms. Telasco's
18 money, true?
19 A Fifth.
20 Q You told Ms. Telasco that she should
21 contact you or Ms. Delisfort if she had questions,
22 true?
23 A Fifth.
24 Q And based on your guarantees, Ms. Telasco
25 did, in fact, in an investment club that she helped

Page 94

1 set up called Investopedia in May 2008, true?
2 A Fifth.
3 Q Ms. Telasco was taught how to set up
4 Investopedia by your employee Kathryn Parker, true?
5 A Fifth.
6 Q Ms. Parker was hired by you, true?
7 A Fifth.
8 Q And this is the lady who was the head of
9 SIMS who had taken over SIMS from Mario Theodule,
10 your relative, true?
11 A Fifth.
12 Q Her paychecks as the head of SIMS came
13 from CCC money, true?
14 A Fifth.
15 Q And Mario Theodule is, in fact, your
16 brother, true?
17 A Fifth.
18 Q On June 22nd, 2008 you hosted a conference
19 call, true, Mr. Theodule?
20 A Fifth.
21 Q During this conference call you told
22 investors, including Ms. Telasco, that you needed
23 more time to honor the withdrawal requests, true?
24 A Fifth.
25 Q You did this to lull investors into

Page 95

1 keeping their money with you, true?
2 A Fifth.
3 Q You hosted more such conference calls
4 after June 2008 during which you continued to ask
5 for more time to honor withdrawals, true,
6 Mr. Theodule?
7 A Fifth.
8 Q Following the conference call you hosted
9 on June 22nd, you refused to let investors withdraw
10 their money from CCC investment clubs, true?
11 A Fifth.
12 Q You refused to let people withdraw their
13 money even though you knew investors like
14 Ms. Telasco were desperate to get their money back
15 during this time, true, Mr. Theodule?
16 A Fifth.
17 Q And then on August 4th, 2008, Ms. Telasco
18 called you personally to ask you about
19 Investopedia's investments, true, Mr. Theodule?
20 A Fifth.
21 Q And she also asked you about her own
22 \$10,000 investment in CCC, true?
23 A Fifth.
24 Q And to placate Ms. Telasco, you told her
25 to take \$10,000 out of deposits from new club

Page 96

1 members, true, Mr. Theodule?
2 A Fifth.
3 Q You basically just recycled new money for
4 Ms. Telasco, true?
5 A Fifth.
6 Q On August 7th, 2008, your wife,
7 Ms. Delisfort, whom you suggested Ms. Telasco call,
8 also told her that it was okay for her to take
9 \$10,000 out of new investor deposits, true?
10 A Fifth.
11 Q And then on August 25th, 2008, your
12 sister, Yvette Williams, hosted a meeting at the
13 office of Dream Makers, another investment club,
14 true?
15 A Fifth.
16 Q And you participated in this meeting on
17 August 25th, 2008 via videoconference, true, sir?
18 A Fifth.
19 Q And during this August 25th, 2008 meeting,
20 you again apologized for refusing to honor
21 withdrawal requests, true, Mr. Theodule?
22 A Fifth.
23 Q Again, you told investors that you needed
24 more time, true?
25 A Fifth.

Page 97

1 Q And all told Investopedia raised \$137,000
2 plus they had \$20,000 transferred in from Crown
3 Ambassador, true?
4 A Fifth.
5 Q All \$137,000 came from Ms. Telasco's
6 family and friends, true, Mr. Theodule?
7 A Fifth.
8 Q And every penny of this \$137,000 was
9 deposited with Creative Capital Concepts and you,
10 Mr. Theodule, true?
11 A Fifth.
12 Q Sir, I'm handing you what we will mark as
13 Exhibit 82. This is a declaration from Angela
14 Telasco and it attaches documents that you have
15 probably previously seen from the PI hearing.
16 (Exhibit No. 82 was marked for
17 identification.)
18 BY MS. PAULOSE:
19 Q Sir, if I could direct your attention -- I
20 think the easiest way to get there is just to go
21 four pages from the end, please. Actually, let's go
22 eight pages from the end. Pardon me. Keep going,
23 sir. May I help you?
24 A Uh-huh.
25 Q Okay. Here we are. There's a page in

Page 98

1 this packet of materials from Angela Telasco that
2 says "CCC Contact List." It lists you as the
3 president and it lists a phone number of
4 561-685-2508 and an e-mail of
5 georgetheodule@yahoo.com; is that correct,
6 Mr. Theodule?
7 A Fifth.
8 Q That, in fact, was your contact
9 information, Mr. Theodule?
10 A Fifth.
11 Q She had that because she communicated --
12 Ms. Telasco communicated directly with you, true,
13 Mr. Theodule?
14 A Fifth.
15 Q And, then, sir, if you want to page four
16 pages in back to where I had initially asked you to
17 go. There we go.
18 Do you see that's an e-mail from an Angela
19 Telasco at Investopedia? Did I -- and that she says
20 in the penultimate paragraph, "As per my
21 conversation with George care of Dorothy on
22 Thursday, 8/7/2008 at 10:04 a.m., I was instructed
23 by George Theodule to subtract my withdrawal request
24 for \$10,000 resulting in a net deposit of \$42,000,
25 but credit of \$52,000." Did I read that accurately,

Page 99

1 sir?
2 A Fifth.
3 Q And, basically, that's -- Ms. Telasco took
4 the money out of new investor funds per your
5 directions, true, Mr. Theodule?
6 A Fifth.
7 Q If you'll turn to the next page where it
8 says Exhibit G. This is a series of e-mails that
9 have been forwarded. The initial e-mail is from
10 you, George Theodule, at georgetheodule@yahoo.com,
11 true, Mr. Theodule?
12 A Fifth.
13 Q And the signature line says "God bless,
14 George Theodule, Saving one life at time," true,
15 Mr. Theodule?
16 A Fifth.
17 Q You sent this to telasco@comcast.net,
18 true, Mr. Theodule?
19 A Fifth.
20 Q Telasco@comcast.net is Angela Telasco,
21 true, Mr. Theodule?
22 A Fifth.
23 Q The head of your investment -- and
24 Ms. Telasco was the head of your investment club
25 Investopedia, true, Mr. Theodule?

Page 100

1 A Fifth.
2 Q And what you sent to Ms. Telasco was this
3 attached newsletter, true, Mr. Theodule?
4 A Fifth.
5 Q This newsletter, if you'll turn to it -- I
6 see you're at the next page. It's dated
7 November 1st, 2008. It says Volume 3, Issue 3,
8 true, Mr. Theodule?
9 A Fifth.
10 Q You personally helped draft this
11 newsletter, true, Mr. Theodule?
12 A Fifth.
13 Q And you personally distributed it to
14 people like Ms. Telasco, true, Mr. Theodule?
15 A Fifth.
16 Q And I take it because it's listed as
17 Volume 3, Issue 3 that you had sent out previous
18 newsletters to investors as well, true,
19 Mr. Theodule?
20 A Fifth.
21 Q And in this newsletter, the title says,
22 "CCC is Strong but not Recession Proof." Sir, if I
23 could direct your attention to the third paragraph.
24 It says, second sentence, "CCC is not in a state of
25 collapse but we must make adjustments to be

Page 101

1 successful and continue to grow."
2 Did I read that accurately, Mr. Theodule?
3 A Where are you?
4 Q Pardon me. May I help you?
5 A Uh-huh.
6 Q Right here (indicating).
7 A Okay. Thank you.
8 Q Shall I read that sentence again?
9 A Yes, please.
10 Q Okay. So the last sentence of that
11 paragraph says, "CCC is not in a state of collapse
12 but we must make adjustments to be successful and
13 continue to grow." Did I read that accurately?
14 A Fifth.
15 Q And, sir, was that a true statement at the
16 time that you made it?
17 A Fifth.
18 Q Sir, if you'll look down to the bottom
19 left where -- if I may -- "The Greatest News of
20 All." It says, "We are working on becoming fully
21 bonded and insured for all past and future
22 investments for up to 2 years." Did I read that
23 accurately?
24 A Fifth.
25 Q Was that a true statement, Mr. Theodule?

Page 102

1 A Fifth.
2 Q Mr. Theodule, in the top left-hand side of
3 this document, it says, "Key Change: Plan A) No
4 withdrawals for 180 days equals current balance less
5 gains plus 50 percent. Management fee equals no
6 fee." Did I read that accurately, sir?
7 A Fifth.
8 Q So in this Plan A you were promising
9 investors that if they did not take out their money
10 that they would get their current balance minus any
11 gains and 50 percent without a management fee, true,
12 Mr. Theodule?
13 A Fifth.
14 Q Then you go on to say, "Plan B) No
15 withdrawals for 270 days plus current balance plus
16 gains plus 100 percent." And you say there would be
17 no management fee, true, Mr. Theodule?
18 A Fifth.
19 Q So, basically, you were promising to
20 double people's money again, true, Mr. Theodule?
21 A Fifth.
22 Q Plan C) was no withdrawals for one year
23 will equal current balance plus 200 percent. No
24 management fee. Did I read that accurately?
25 A Fifth.

Page 103

1 Q Actually, what it says is management fee
2 equals no fee. Did I describe that correctly,
3 Mr. Theodule?
4 A Fifth.
5 Q And, here again, you were promising a 200
6 percent return to investors, true, Mr. Theodule?
7 A Fifth.
8 Q Was this a true promise, Mr. Theodule?
9 A Fifth.
10 Q At the time you made this promise, you
11 knew it was false, didn't you, Mr. Theodule?
12 A Fifth.
13 Q If you'll direct your attention, sir, to
14 the bottom of the page, "Closing With Better News,
15 Finding Calm in a Stormy Economic Climate." It
16 says, "In spite of all this, rest assured that your
17 money is secure and not lost."
18 Did I read that correctly, Mr. Theodule?
19 A Fifth.
20 Q Was that a true statement, Mr. Theodule?
21 A Fifth.
22 Q In fact, investors money was not secure
23 and it had been lost, true, Mr. Theodule?
24 A Fifth.
25 Q It had been lost through fraud and losses

Page 104

1 in the stock market, true, Mr. Theodule?
2 A Fifth.
3 Q Then it goes on to say that "The monies
4 that you have already invested will maintain its
5 gain as long as you opt to not withdraw for one
6 year. See left column for the 90 day or 180 day
7 plan." Did I read that accurately, Mr. Theodule?
8 A Fifth.
9 Q Was that a true statement at the time that
10 you made it, Mr. Theodule?
11 A Fifth.
12 Q You knew at the time that you made it that
13 the statement couldn't possibly be true, didn't you,
14 Mr. Theodule?
15 A Fifth.
16 Q The money that was invested did not gain,
17 did it, Mr. Theodule?
18 A Fifth.
19 Q Because it had been lost by fraud, true,
20 Mr. Theodule?
21 A Fifth.
22 Q The last sentence in that paragraph, sir,
23 says, "CCC is going strong and rest assured that you
24 have invested with a capable group." Did I read
25 that accurately, sir?

Page 105

1 A Fifth.
2 Q Is that a true statement, Mr. Theodule?
3 A Fifth.
4 Q CCC was not growing strong at the time of
5 November 1st, 2008, was it, Mr. Theodule?
6 A Fifth.
7 Q But still you continued to recruit
8 investors making these same promises, true,
9 Mr. Theodule?
10 A Fifth.
11 Q And as late as December of 2008, you were
12 continuing to recruit investors, true, Mr. Theodule?
13 A Fifth.
14 Q Mr. Theodule, do you know how many
15 investors were calling CCC asking for their money
16 back?
17 A Fifth.
18 Q In April of 2008, you met with an investor
19 named Colin Whitehall at the Roosevelt Hotel in
20 New York City, true, Mr. Theodule?
21 A Fifth.
22 Q You told Mr. Whitehall that by investing
23 with you through Creative Capital you would double
24 his money after three months, true, Mr. Theodule?
25 A Fifth.

Page 106

1 Q You told him you would double his money in
2 a quarter by investing in real estate, stocks, and
3 hedging, true, Mr. Theodule?
4 A Fifth.
5 Q You told him the only condition was that
6 he could not withdrawal his funds for a minimum of
7 90 days, true, Mr. Theodule?
8 A Fifth.
9 Q You never mentioned any risks associated
10 with Creative Capital's investment strategy, did
11 you, Mr. Theodule?
12 A Fifth.
13 Q Mr. Whitehall tried to withdrawal his
14 money from you as early as August 13, 2008, true,
15 Mr. Theodule?
16 A Fifth.
17 Q And Mr. Whitehall personally called you up
18 several times during September of 2008 to request
19 the return of his investment, true, Mr. Theodule?
20 A Fifth.
21 Q No one ever returned any of
22 Mr. Whitehall's calls, including you, Mr. Theodule,
23 true?
24 A Fifth.
25 Q Because all of Mr. Whitehall's money had

Page 107

1 been stolen by CCC and you, true, Mr. Theodule?
2 A Fifth.
3 MR. WEIGEL: Objection. Misstates
4 evidence.
5 BY MS. PAULOSE:
6 Q You met an investor named Berthrum
7 Brewster, true, Mr. Theodule?
8 A Fifth.
9 Q You met Mr. Brewster in February or March
10 of 2008 at the Roosevelt Hotel in New York, true,
11 Mr. Theodule?
12 A Fifth.
13 Q Mr. Brewster came to your penthouse suite
14 in that hotel, true, Mr. Theodule?
15 A Fifth.
16 Q He came to your suite with a number of
17 other people, including Mr. Whitehall and Mohan
18 Singh, true, sir?
19 A Fifth.
20 Q Ms. Parker was also present during this
21 meeting, true, Mr. Theodule?
22 A Fifth.
23 Q You encouraged Mr. Brewster and other
24 investors to invest with you at this meeting, true,
25 Mr. Theodule?

Page 108

1 A Fifth.
2 Q You told Mr. Brewster and other investors
3 that you were, "playing the stock market," true,
4 Mr. Theodule?
5 A Fifth.
6 Q You told Mr. Brewster and other investors
7 that you had had recent success in playing the stock
8 market, true?
9 A Fifth.
10 Q You told Mr. Brewster and other investors
11 that you could double their money every three
12 months, true?
13 A Fifth.
14 Q And you continued this meeting with the
15 investors which --
16 MS. PAULOSE: Pardon me. Did we just
17 have somebody join?
18 MR. PATRICK: This is Brad Patrick.
19 MS. PAULOSE: Brad, you are not a
20 party to this litigation and you have no right
21 to be present during this deposition.
22 MR. WEIGEL: Actually, he does.
23 MS. PAULOSE: No, he doesn't.
24 MR. WEIGEL: In any case, it's a
25 public deposition.

Page 109

1 MS. PAULOSE: It is not a public
2 deposition, and he has no right to be present
3 at this deposition. You know that as well as I
4 do, Mr. Weigel.
5 MR. WEIGEL: I don't know that.
6 MS. PAULOSE: Well, then we can call
7 the Court, because Mr. Patrick has no business
8 participating in this deposition.
9 MR. PATRICK: Who am I talking to?
10 MS. PAULOSE: This is Rachel Paulose
11 from the SEC. You would know who you were
12 talking to if you had participated in any of
13 the events up to this point, which you have
14 not, since you are not a party to this
15 litigation. And you need to drop off this
16 call, Mr. Patrick.
17 MR. PATRICK: May I ask how it is
18 that the case in which I have appeared had a
19 deposition notice issue that I received through
20 CM/ECF?
21 MS. PAULOSE: You have not appeared
22 in this case, Mr. Patrick. You are not listed
23 as counsel in this case, which is the SEC's
24 case against Mr. Theodule. And you need to
25 drop off this call at this point.

Page 110

1 MR. PATRICK: I would strenuously
2 object until I get this clarified.
3 MS. PAULOSE: You can object as long
4 as you want, but you are not a party to this
5 litigation. And you need to drop off this call
6 because this is highly inappropriate and
7 unethical, and you know it.
8 MR. WEIGEL: The Receiver has
9 cross-noticed this deposition. That's my
10 understanding.
11 MR. KOROGLU: Yes, but he's neither a
12 party nor is his client being deposed in the
13 case that we cross-noticed it in. We
14 crossed-noticed it in the case that Ms. Paulose
15 is taking the deposition in, not in any
16 potential case or adversary case against his
17 client.
18 MS. PAULOSE: Mr. Patrick, you are
19 not a party to this litigation. You need to
20 drop off this call.
21 MR. PATRICK: I'll send you a letter.
22 MS. PAULOSE: You can drop off -- are
23 you dropping off this call, Mr. Patrick?
24 MR. PATRICK: I'm going to drop off
25 this call, but I want the record -- are we on

Page 111

1 the record?
2 MS. PAULOSE: Yes, we are.
3 MR. PATRICK: I would like to make
4 very clear that I deeply resent the implication
5 that there is anything unethical going on here.
6 I received a notice of deposition. I responded
7 to it. I was provided the calling information.
8 MS. PAULOSE: You were not provided
9 the calling information by me, and this is my
10 deposition for the SEC, Mr. Patrick. You know
11 that. You are not a party to this litigation
12 by the SEC.
13 MR. PATRICK: I'm going to get off
14 the call in the interest of allowing you to
15 move forward. I'll be sending you separate
16 correspondence. And to the extent that your
17 implication is that there's somehow something
18 nefarious going on here or that there's
19 anything unethical going on here, I strenuously
20 object to that.
21 MS. PAULOSE: And I strenuously
22 object to the fact that you are dropping in on
23 this case. You have not appeared in a single
24 deposition. We have not included you on a
25 single filing in this case. But that's fine,

Page 112

1 you can drop off the call now.
2 MR. PATRICK: Have a pleasant
3 afternoon.
4 MS. PAULOSE: You too, Mr. Patrick.
5 Good-bye. Mr. Weigel?
6 MR. WEIGEL: Yes.
7 MS. PAULOSE: And Receiver's counsel,
8 you're still there?
9 MR. KOROGLU: Yes.
10 MS. PAULOSE: All right. What was my
11 last question, please?
12 THE COURT REPORTER: "And you
13 continued this meeting with the investors
14 which --"
15 BY MS. PAULOSE:
16 Q Pardon me. I'm going to try to go back to
17 where I was, Mr. Theodule. I didn't want to ask you
18 the same question twice.
19 A No problem.
20 Q Mr. Theodule, you continued this meeting
21 with the investors which started on a Saturday to
22 the next day, a Sunday, true?
23 A Fifth.
24 Q And during the Sunday meeting, you again
25 made a presentation, this time using a white board,

Page 113

1 true?
2 A Fifth.
3 Q You told Mr. Brewster and others again
4 that you would double their money in 90 days at this
5 Sunday meeting, true?
6 A Fifth.
7 Q You repeated this promise again on the
8 telephone later with Mr. Brewster, true?
9 A Fifth.
10 Q And based on your promise, Mr. Brewster
11 gave you \$5,000, true?
12 A Fifth.
13 Q And Mr. Brewster did not get a single
14 penny back of his investment, did he?
15 A Fifth.
16 Q You encouraged Mr. Brewster and others to
17 recruit their family and friends for investment
18 clubs, true?
19 A Fifth.
20 Q You described investment clubs as vehicles
21 to raise money for CCC, true?
22 A Fifth.
23 Q Sir, one of CCC's investment clubs was
24 called the Hollywood Private Investment Club, LLC,
25 true?

Page 114

1 A Fifth.
2 Q This club was based in Hollywood, Florida,
3 true?
4 A Fifth.
5 Q You personally gave a presentation for
6 Hollywood's investors, true?
7 A Fifth.
8 Q And during this presentation to the
9 Hollywood Private Investment Club, you promised to
10 double investor funds within 90 days, true?
11 A Fifth.
12 Q Mr. Theodule, it's a fact that you
13 repeatedly diverted CCC money to other individuals
14 for no business purpose, correct, sir?
15 A Fifth.
16 MR. WEIGEL: Objection. Misstates
17 evidence.
18 BY MS. PAULOSE:
19 Q Sir, I'm placing in front of you what I
20 think we've already marked as an exhibit, but I
21 don't remember the exhibit number. So we'll re-mark
22 it as 83.
23 Mr. Theodule, Exhibit 83 is a gift note
24 dated January 29th, 2008. Mr. Theodule, do you
25 recognize the name and signature at the bottom of

Page 115

1 this note?
2 A Fifth.
3 Q That's your name and signature, George
4 Theodule, correct, sir?
5 A Fifth.
6 Q And it says, "To Whom it May Concern: I,
7 George Theodule, give to Detra Pasby on this day of
8 January twenty-ninth, two thousand and eight one
9 hundred and fifty thousand dollars (\$150,000) as a
10 gift."
11 Did I read that accurately?
12 A Fifth.
13 Q And it's notarized by Ms. Tanisha T.
14 Hightower on February 14, 2008, true, sir?
15 A Fifth.
16 Q You gave Ms. Pasby this \$150,000 via this
17 note, or at least this note documented the gift that
18 you gave her?
19 A Fifth.
20 MR. WEIGEL: Objection. Misstates
21 evidence.
22 BY MS. PAULOSE:
23 Q Ms. Pasby insisted on getting this note
24 form you, true?
25 A Fifth.

Page 116

1 Q And she did that because she didn't want
2 you or anyone else to come back and try to get the
3 money back, true?
4 A Fifth.
5 Q This money came from CCC investor funds,
6 true?
7 A Fifth.
8 Q And Ms. Pasby had no right to this money;
9 you simply gave it to her as a personal gift, true?
10 A Fifth.
11 MR. WEIGEL: Objection. Misstates
12 evidence.
13 BY MS. PAULOSE:
14 Q Ms. Pasby is your ex-fiancee, true,
15 Mr. Theodule?
16 A Fifth.
17 Q You also opened an optionsXpress account
18 with Ms. Pasby using CCC money, true, Mr. Theodule?
19 A Fifth.
20 Q Sir, I'm placing in front of you what
21 we'll mark as Exhibit 84. This is an optionsXpress
22 new account joint account application, true,
23 Mr. Theodule?
24 A Fifth.
25 Q It's a joint application of Ms. Detra A.

Page 117

1 Pasby and Mr. George L. Theodule, you, sir, correct?
2 A Fifth.
3 Q And, sir, do you see where the address is
4 listed as 10176 Sheila Court, Wellington, Florida,
5 33414? Did I read that accurately?
6 A Fifth.
7 Q That's your former home address, true,
8 Mr. Theodule?
9 A Fifth.
10 Q And the date of birth of 12/9/1960 is your
11 date of birth, true, Mr. Theodule?
12 A Fifth.
13 Q And the Social Security number of
14 361-60-1582 is the Social Security number you
15 previously told Ms. Van Vliet is your Social
16 Security number, true, Mr. Theodule?
17 A Fifth.
18 Q Sir, if you look at the next page where it
19 says customer signature and co-applicant's
20 signature, the customer's signature, that's
21 Ms. Pasby's signature, isn't it, Mr. Theodule?
22 A Fifth.
23 Q You're familiar with it since she was your
24 ex-fiancee, true, sir?
25 A Fifth.

Page 118

1 Q And that's your signature dated 1/31/2007,
2 true, Mr. Theodule?
3 A Fifth.
4 Q You deposited CCC money into this joint
5 account that you opened with Ms. Pasby, true,
6 Mr. Theodule?
7 A Fifth.
8 Q But you knew she was taking money, CCC
9 money, from this account that she shared with you,
10 true, Mr. Theodule?
11 A Fifth.
12 Q And she did it for no legitimate business
13 purpose, true, Mr. Theodule?
14 A Fifth.
15 Q She did it to fund her own lifestyle,
16 true, sir?
17 A Fifth.
18 Q Now, Ms. Pasby was aware of the deposits
19 that you made to the optionsXpress account using CCC
20 money because she was also noticed on this account,
21 true, Mr. Theodule?
22 A Fifth.
23 MR. WEIGEL: Objection. Speculation.
24 (Exhibit No. 84 was marked for
25 identification.)

Page 119

1 BY MS. PAULOSE:
2 Q Sir, I'm placing in front of you a series
3 of e-mails. There are three e-mails -- I'm sorry --
4 four pages of e-mails. And the first page -- we'll
5 mark this as Exhibit 85 -- is to a dpasby@yahoo.com.
6 That's Detra Pasby, true, Mr. Theodule?
7 A Fifth.
8 Q And this is an optionsXpress e-mail that
9 says, "Dear Miss Detra A. Pasby, We received your
10 deposit from Wire Washington Mutual Bank for \$2
11 million." Did I read that accurately?
12 A Fifth.
13 Q That money was deposited by you, right,
14 Mr. Theodule?
15 A Fifth.
16 Q And you got that money from CCC investor
17 money, true, Mr. Theodule?
18 A Fifth.
19 Q Ms. Pasby saw this money deposited in on
20 July 9, 2008, and decided to use it for her own
21 purpose, true, Mr. Theodule?
22 A Fifth.
23 Q Could you please turn to the next page?
24 There's an e-mail dated July 30 of 2008 to
25 dpasby@yahoo.com. It says, "Dear Miss Detra A.

Page 120

1 Pasby: Your \$263,210.90 wire withdrawal request has
2 been received and will be submitted for processing."
3 Did I read that accurately, Mr. Theodule?
4 A Fifth.
5 Q Ms. Pasby took the CCC money in the amount
6 of \$263,000 and change, true, sir?
7 A How much?
8 Q \$263,310.90.
9 A Fifth.
10 Q And, sir, she told you she was taking this
11 money, true?
12 A Fifth.
13 Q And you told her that that was just fine,
14 true?
15 A Fifth.
16 MR. WEIGEL: Objection.
17 BY MS. PAULOSE:
18 Q And Ms. Pasby used the money to buy a
19 house in Las Vegas?
20 A Fifth.
21 MR. WEIGEL: Objection. Calls for
22 speculation.
23 BY MS. PAULOSE:
24 Q She used it and paid cash down for that
25 house, true, Mr. Theodule?

Page 121

1 A Fifth.
2 MR. WEIGEL: Calls for speculation.
3 BY MS. PAULOSE:
4 Q She's currently living in that house
5 bought with CCC investor money, true, Mr. Theodule?
6 A Fifth.
7 THE WITNESS: Calls for speculation.
8 BY MS. PAULOSE:
9 Q Mr. Theodule, I previously had asked you
10 about Kathryn Parker and the Early Views startup
11 company. Do you recall that?
12 A Fifth.
13 Q You gave Ms. Parker \$126,516.75 as seed
14 money to start up an entity called Early Views,
15 correct, Mr. Theodule?
16 A Fifth.
17 Q That \$126,516.75 came out of CCC investor
18 funds, true, Mr. Theodule?
19 A Fifth.
20 Q Ms. Parker prepared a promissory note to
21 document the CCC money that you gave her, true,
22 Mr. Theodule?
23 A Fifth.
24 Q But you told Ms. Parker in April 2008 that
25 you did not want to document that gift, true,

Page 122

1 Mr. Theodule?
2 A Fifth.
3 Q You told her, "No, I don't want anything
4 for this company," true?
5 A Fifth.
6 Q You told Ms. Parker, "I need a legitimate
7 business so that when I get out of jail I can have
8 some money somewhere," true?
9 A Fifth.
10 Q You also opened --
11 MR. WEIGEL: Misstates evidence.
12 BY MS. PAULOSE:
13 Q You also opened an optionsXpress account
14 with Ms. Parker using CCC money, true, Mr. Theodule?
15 A Fifth.
16 Q You also gave your sister, Yolette
17 Williams, money for a condominium, true,
18 Mr. Theodule?
19 A Fifth.
20 MR. WEIGEL: Objection. Misstates
21 evidence.
22 BY MS. PAULOSE:
23 Q The money for this condominium came from
24 CCC funds, true, Mr. Theodule?
25 A Fifth.

Page 123

1 Q You gave your employee and personal
2 assistant, Krissy McKeon, a total of \$300,000 of CCC
3 money, true, Mr. Theodule?
4 A Fifth.
5 MR. WEIGEL: Objection. Misstates
6 evidence.
7 BY MS. PAULOSE:
8 Q About \$250,000 of this money you
9 instructed her to give to others, true,
10 Mr. Theodule?
11 A Fifth.
12 MR. WEIGEL: Objection. Misstates
13 evidence.
14 BY MS. PAULOSE:
15 Q She used about \$50,000 to set up an
16 alleged insurance company with Ms. Parker, true,
17 Mr. Theodule?
18 A Fifth.
19 MR. WEIGEL: Objection. Misstates
20 evidence. Calls for speculation.
21 BY MS. PAULOSE:
22 Q In fact, that money -- that insurance
23 company never even got off the ground, just as Early
24 Views never got off the ground, did it,
25 Mr. Theodule?

Page 124

1 A Fifth.
2 MR. WEIGEL: Calls for speculation.
3 BY MS. PAULOSE:
4 Q And this money all came from CCC
5 investors, true, Mr. Theodule?
6 A Fifth.
7 MR. WEIGEL: Calls for speculation.
8 BY MS. PAULOSE:
9 Q Mr. Theodule, I am placing in front of you
10 what we'll mark as Exhibit 59 -- I'm sorry. I can't
11 read upside down -- 86.
12 Mr. Theodule, Exhibit 86 I'm going to just
13 give you a moment to look that over.
14 MR. WEIGEL: How much more do you
15 have, Rachel?
16 MS. PAULOSE: We're just going to go
17 through the account statements. I don't think
18 it's going to be that much more.
19 MR. WEIGEL: You're doing them as
20 composites?
21 MS. PAULOSE: Pardon me?
22 MR. WEIGEL: You're doing them as
23 composites?
24 MS. PAULOSE: That's right. There
25 will be eight or so, or maybe it's close to

Page 125

1 ten.
2 BY MS. PAULOSE:
3 Q This composite exhibit is titled Gmail -
4 Fnivose. And the first e-mail is from Shuja Khan.
5 This second -- I'm sorry. The third page in is
6 dated Friday, June 27th, 2008 at 11:36 a.m. It's to
7 georgetheodule@yahoo.com and fnivose@gmail.com. The
8 subject is OX Trade Notice - MOS JUL 160 Call. It's
9 for an account number ending in 8807 that belongs to
10 Mr. Nivose and George Theodule. Did I describe that
11 accurately, Mr. Theodule?
12 A Fifth.
13 Q The last page of this document is dated
14 Thursday, April 24th, 2008 at 5:40 p.m. It went to
15 you twice at georgetheodule@yahoo.com and also
16 Mr. Nivose. Do you need a moment, Mr. Theodule?
17 A No.
18 Q Did I describe that accurately,
19 Mr. Theodule?
20 A Fifth.
21 Q And these are transaction statements that
22 went to -- every single one went to you but for the
23 first page, true, Mr. Theodule?
24 A Fifth.
25 Q This was an account that you opened with

Page 126

1 Mr. Nivose using CCC investor money, true,
2 Mr. Theodule?
3 A Fifth.
4 Q What happened to all of this investor
5 money, Mr. Theodule?
6 A Fifth.
7 Q Was it used for any legitimate business
8 purpose, Mr. Theodule?
9 A Fifth.
10 (Exhibit No. 86 was marked for
11 identification.)
12 BY MS. PAULOSE:
13 Q Sir, I'm handing you what we'll mark as a
14 composite Exhibit 87. The cover page says Gmail -
15 Julius. Sir, this is a series of e-mails to
16 juliustheodule@gmail.com, a relative of yourself,
17 true, Mr. Theodule?
18 A Fifth.
19 Q Now, the second page in says, "George, The
20 account you recently opened is still pending your
21 signature and funds." Did I read that accurately?
22 A Fifth.
23 Q And then the next page is addressed to
24 George in Wellington, Florida. It says, "Thank you
25 for opening an account with optionsXpress."

Page 127

1 The next e-mail is also addressed to
2 George Theodule. The next e-mail is also addressed
3 to George Theodule.
4 Did I describe these pages accurately,
5 Mr. Theodule?
6 A Fifth.
7 Q Sir, you opened this account with Julius
8 Theodule using CCC money, true, sir?
9 A Fifth.
10 Q Where did all this CCC investor money go?
11 A I don't see what you're talking about.
12 Q The money that went into this account.
13 A I didn't see it. Where is it that you're
14 talking about? What page are you on?
15 Q Oh, I'm looking through all of them.
16 A I didn't see anything. Your question was
17 referring to money. I don't see the money. I'm
18 sorry.
19 Q Okay.
20 A You know, I cannot see 50-something that
21 you're presenting that does not have anything to do
22 with --
23 Q Okay. Well, it says --
24 A I will answer to it if it had the
25 documents that you're presenting.

Page 128

1 Q Okay. Let me read off this first page.
2 It says, "George the account you recently opened is
3 still pending your signature and funds."
4 A Thank you.
5 Q That would suggest that you needed to open
6 an account with funds, true, Mr. Theodule?
7 A That is true.
8 Q Okay. So if you go to the next page,
9 which is dated December 10, 2007, it says, "Thank
10 you for opening an account with optionsXpress."
11 A Uh-huh.
12 Q Okay. Which would suggest that you had
13 opened the account with funds, true?
14 MR. WEIGEL: Objection.
15 THE WITNESS: That who opened the
16 account?
17 BY MS. PAULOSE:
18 Q That you had opened the account.
19 A Fifth.
20 Q Okay. Sir, if you could go to the last
21 page of this document. It says, "To: Mr. George
22 Theodule, Re: Senior Political Figure."
23 In the first paragraph it says, "Thank you
24 for recently opening an optionsXpress account.
25 During your application process, you indicated that

Page 129

1 you were a senior foreign political figure, an
2 immediate relative of senior foreign political
3 figure or a close associate of such an official."
4 Did you make such a representation,
5 Mr. Theodule?
6 A Fifth.
7 (Exhibit No. 87 was marked for
8 identification.)
9 BY MS. PAULOSE:
10 Q Sir, I'm going to go to Exhibit 88,
11 another composite exhibit. The title is Myway -
12 George.
13 Sir, again, this first e-mail is from
14 Shuja Khan. All of these e-mails in this packet
15 went to powerofone@myway.com. Is that a correct
16 description of these e-mails, sir?
17 A Fifth.
18 Q And, sir, the second page in says, "Dear
19 Mrs. Elza Theodule, The following transaction has
20 been completed." It describes an account number of
21 0186-0048 for Elza Theodule and George Theodule.
22 Did I read that accurately?
23 A Fifth.
24 Q Who is Mrs. Elza Theodule, sir?
25 A Fifth.

Page 130

1 Q She's your late wife, isn't she,
2 Mr. Theodule?
3 A Fifth.
4 Q I'm sorry about your loss.
5 A Thank you.
6 Q This is an account that you opened with
7 your late wife, true, sir?
8 A Fifth.
9 Q Sir, if you can turn four pages in, it
10 says, "Dear Mrs. Elza Theodule, We have received
11 your deposit from Wire Washington Mutual Bank for \$2
12 million." Did I read that accurately?
13 A For how much did you say?
14 Q I'm sorry. You're right. \$2,000.
15 A Okay.
16 Q "We received your deposit from Wire
17 Washington Mutual Bank for \$2,000." I apologize.
18 My eyes aren't as good as they used to be. Did I
19 read that accurately?
20 A Fifth.
21 Q This deposit was CCC investor money, true,
22 Mr. Theodule?
23 A Fifth.
24 Q Okay. Sir, I'll show you on my version.
25 We're looking at an e-mail June 4th, 2007. "Dear

Page 131

1 Elza Theodule, We received your deposit from Wire
2 Washington Mutual Bank for \$2,300." Where did that
3 money come from.
4 A Fifth.
5 Q Sir, going to the e-mail dated Wednesday,
6 May 30th, 2007 at 3:44 p.m. to powerofone@myway.com,
7 it says, "Dear Mrs. Elza Theodule, We received your
8 deposit from Wire Washington Mutual Bank for
9 \$1,000." Where did that money come from?
10 A Fifth.
11 Q Sir, going to the e-mail dated Thursday,
12 May 10, 2007 to powerofone@myway.com, it says, "Dear
13 Mrs. Elza Theodule, We received your deposit from
14 Wire Washington Mutual Bank for \$2,500." Where did
15 that money come from?
16 A Fifth.
17 Q Going to the e-mail dated Monday,
18 April 16, 2007, at 3:02 p.m. "Mrs. Elza Theodule,
19 We received your deposit from Wire Washington Mutual
20 Bank for \$1,500." Where did that money come from?
21 A Fifth.
22 Q The e-mail dated April 10th, 2007, 12:46
23 p.m. "Dear Mrs. Elza Theodule, We have received
24 your deposit from Wire Washington Mutual Bank for
25 \$1,500." Where did that money come from?

Page 132

1 A Fifth.
2 Q Sir, going to Tuesday, January 16, 2007,
3 "Dear Mrs. Elza Theodule, We received your deposit
4 from Wire Washington Mutual Bank for \$5,000." Where
5 did that money come from?
6 A Fifth.
7 Q The e-mail dated Thursday, January 11,
8 2007, 5:10 a.m. indicates, "Ms. Elza Theodule has
9 invited you to open a free optionsXpress trading
10 account." Did you open this account, sir?
11 A Fifth.
12 Q Okay. And it's addressed to
13 georgetheodule@yahoo.com. Did I read that
14 accurately?
15 A Fifth.
16 Q There's an e-mail that's dated, Tuesday,
17 August 2nd, 2005 where you've opened an account,
18 signed it "Have a blessed day." Did that message
19 come from you, Mr. Theodule?
20 A Fifth.
21 Q Sir, the e-mail dated Thursday, June 30th,
22 2005 to powerofone@myway.com, it says, "Ned, Please
23 accept my apologies. I will be funding this account
24 before the end of July. I am stuck on some (option
25 - puts) with another brokerage right now. Have a

Page 133

1 blessed day." Did you spend that e-mail,
2 Mr. Theodule?
3 A Fifth.
4 Q Where did all this money come from,
5 Mr. Theodule?
6 A Fifth.
7 Q And where did it go, sir?
8 A Fifth.
9 (Exhibit No. 88 was marked for
10 identification.)
11 BY MS. PAULOSE:
12 Q Sir, I'm handing you a composite exhibit
13 which the title page says Yahoo - George E-mail 1.
14 We'll mark it as Exhibit 89 in this case.
15 (Exhibit No. 89 was marked for
16 identification.)
17 BY MS. PAULOSE:
18 Q Sir, this is a fairly voluminous composite
19 exhibit, 89. Every single one of these e-mails went
20 to georgetheodule@yahoo.com but for the first one
21 which is from Shuja Kahn; is that true,
22 Mr. Theodule?
23 A Fifth.
24 Q And these also describe more optionsXpress
25 trading, true, Mr. Theodule?

Page 134

1 A Fifth.
2 Q This was for your optionsXpress account,
3 true, Mr. Theodule?
4 A Fifth.
5 Q And I think these are in reverse
6 chronological order. So if we go to the last page,
7 it's dated Thursday, January 3rd, 2008 at 7:31 a.m.
8 to georgetheodule@yahoo.com. And if we go to the
9 second page, it goes to July 22nd, 2008 at 10:13
10 a.m. Is that an accurate description, Mr. Theodule?
11 A I'm kind of confused.
12 Q Okay. Well, let's make sure you're not
13 confused. This last date is January 3rd, 2008 at
14 7:31 a.m., true, sir?
15 A Yes.
16 Q Okay. Now, if you go to the very -- I'm
17 sorry. Let's go to the very beginning. Okay. Can
18 I help you? This first e-mail is what I was
19 referring to as being July 22nd, 2008. Is that
20 accurate?
21 A Fifth.
22 Q I know it's a little confusing because
23 it's in reverse chronological order. That's how
24 they printed out.
25 A Okay.

Page 135

1 Q These also describe optionsXpress trading?
2 A Fifth.
3 Q Is that true, Mr. Theodule?
4 A Fifth.
5 Q Some of these trades were done with
6 Gabrielle Alexis, true, Mr. Theodule?
7 A Fifth.
8 Q Sir, I'm happy to have you work off my
9 copy if that would be easier for you.
10 A Yeah.
11 Q Let's go to the e-mail dated Tuesday,
12 July 22nd, 2008 at 10:03 a.m. It says, "Dear George
13 Theodule, The following transaction has been
14 completed on 7/22/2008 for the account number ending
15 in 6260, George Theodule --" they've misspelled your
16 name here "-- and Gabrielle Alexis. Did I read that
17 accurately?
18 A Fifth.
19 Q And, sir, going to the next page, it's
20 describing -- there's an e-mail of Tuesday,
21 July 22nd, 2008 at 9:53 a.m. to
22 georgetheodule@yahoo.com. It says, "Dear George
23 Theodule," another transaction again for the account
24 number ending in 6260 with George Theodule and
25 Gabrielle Alexis. Did I read that accurately?

Page 136

1 A Fifth.
2 Q Okay. And jumping to the e-mail dated
3 Tuesday, July 8th, 2008 at 5:15 p.m. This is also
4 addressed to George Theodule, you --
5 georgetheodule@yahoo.com, you. It says, "We have
6 received your deposit from Wire Washington Mutual
7 Bank for \$2 million." Did I read that accurately?
8 A Fifth.
9 Q Where did that money come from,
10 Mr. Theodule?
11 A Fifth.
12 Q Did it come from CCC investor money?
13 A Fifth.
14 Q Sir, turning to the next page, it says
15 Tuesday, July 8th, 2008 at 5:15 p.m. It's, again,
16 addressed to you, georgetheodule@yahoo.com. It
17 says, "Dear George Theodule, We have received your
18 deposit from Wire Wachovia Bank for \$4 million."
19 Did I read that accurately?
20 A Fifth.
21 Q Mr. Theodule, where did this \$4 million
22 come from?
23 A Fifth.
24 Q Did it come from CCC investor money,
25 Mr. Theodule?

Page 137

1 A Fifth.
2 Q Mr. Theodule, again, the next e-mail is
3 Monday, July 7th, 2008 at 10:18 a.m. addressed to
4 you at georgetheodule@yahoo.com. It's an account
5 number ending in 6260. It also confirms your
6 account. Is that accurate, Mr. Theodule?
7 A Fifth.
8 Q Now, the next e-mail I'm looking at is
9 Monday, June 30th, 2008 at 3:54 p.m. It's addressed
10 to Yolette Fabre and George Theodule for an account
11 number ending in 0553. Did I read that accurately,
12 Mr. Theodule?
13 A Fifth.
14 Q And was this money also CCC investor
15 money, Mr. Theodule?
16 A Fifth.
17 Q Sir, looking at the e-mail going to
18 Friday, June 27th, 2008, it's addressed to
19 georgetheodule@yahoo.com and fnivose@gmail.com. It
20 says, "Dear Mr. Nivose, The following transaction
21 has been completed," and it describes the account
22 ending in 8807 for Mr. Nivose and Georgia Theodule.
23 Did I describe that accurately?
24 A Fifth.
25 Q Did this also involve CCC money,

Page 138

1 Mr. Theodule?
2 A Fifth.
3 Q There's another e-mail to you,
4 georgetheodule@yahoo.com, on Tuesday June 24th, 2008
5 at 12:42 p.m. It says, "Ms. Fabre, we have received
6 a \$275,000 wire transfer for your account." Where
7 did that wire money come from Mr. Theodule?
8 A Fifth.
9 Q Do you need a moment, Mr. Theodule?
10 A No.
11 Q Okay. Now, did this money come from CCC
12 money that had been entrusted to you, Mr. Theodule?
13 A Fifth.
14 Q Mr. Theodule, I'm looking at an e-mail
15 that is now dated June 23rd, 2008. It's addressed
16 to you, georgetheodule@yahoo.com, for an account
17 number in 0553 and describes this account. Did I
18 read that accurately?
19 A Fifth.
20 Q Was this account also opened with and for
21 CCC money?
22 A Fifth.
23 Q The e-mail dated Monday June 23rd, 2008 at
24 12:31 p.m. is addressed to you,
25 georgetheodule@yahoo.com. It describes an account

Page 139

1 being opened with Yolette Fabre. I read that
2 correctly?
3 A Sir.
4 Q And, sir, was this account opened with and
5 for CCC money?
6 A Fifth.
7 Q Did Yolette Fabre have any legitimate
8 business accessing this account, Mr. Theodule, with
9 you?
10 A Fifth.
11 Q Sir, turning your attention to the e-mail
12 dated Tuesday, June 17th, 2008. It's addressed to
13 Yolette Fabre and George Theodule at 6101 Loquat
14 Circle in Tamarac, Florida. It says, "Thank you for
15 opening an account with optionsXpress." Is this the
16 account that you opened with Yolette Fabre,
17 Mr. Theodule?
18 A Fifth.
19 Q Did you do that with CCC money, sir?
20 A Fifth.
21 Q Sir, there's an e-mail dated April 4th,
22 2008 at 4 p.m. It's addressed to you,
23 georgetheodule@yahoo.com. It says, "Dear Mr. George
24 L. Theodule, We have received your deposit from Wire
25 Washington Mutual Bank for \$500,000." Did I read

Page 140

1 that accurately?
2 A Fifth.
3 Q Where did that wire come from,
4 Mr. Theodule?
5 A Fifth.
6 Q Was that CCC investor money, Mr. Theodule?
7 A Fifth.
8 Q What was done with all this money that was
9 being transferred in to these optionsXpress accounts
10 in Exhibit 89, Mr. Theodule?
11 A Fifth.
12 Q Sir, turning your attention to what we'll
13 mark as Exhibit 90. The title says Yahoo - George
14 E-mail 2. Sir, it's another voluminous composite
15 exhibit.
16 (Exhibit No. 90 was marked for
17 identification.)
18 BY MS. PAULOSE:
19 Q And, again, this first e-mail is from
20 Shuja Khan. After that all the e-mails are to
21 georgetheodule@yahoo.com. Is that correct, sir?
22 A Fifth.
23 Q Sir, if you look at the last page of this
24 exhibit, it's dated Thursday, August 2nd, 2007 at
25 11:11 a.m. It's to georgetheodule@yahoo.com; is

Page 141

1 that correct?
2 A Fifth.
3 Q And, again, these, I think, are going in
4 reverse chronological order. If you go to the
5 second page of this exhibit, it's dated Monday,
6 December 24th, 2007, 11:22 a.m. Did I read that
7 accurately?
8 A Fifth.
9 Q Also addressed to you,
10 georgetheodule@yahoo.com, true, sir?
11 A Fifth.
12 Q More trading records for an optionsXpress
13 account, true, Mr. Theodule?
14 A Fifth.
15 Q Sir, would you like to work off my copy
16 again?
17 A Please.
18 Q So I'm going to share this with you.
19 Let's look at the e-mail dated Wednesday,
20 October 17, 2007 at 10:16 a.m. It's to you,
21 georgetheodule@yahoo.com. It says, "Dear Mr. George
22 L. Theodule, We received your deposit from Wire
23 Washington Mutual Bank for \$5,000." Did I read that
24 accurately?
25 A Fifth.

Page 142

1 Q Where did that money come from,
2 Mr. Theodule?
3 A Fifth.
4 Q Sir, if we look at the e-mail dated
5 Monday, September 17, 2007 to
6 georgetheodule@yahoo.com, it says, "Dear Mr. George
7 L. Theodule, Your \$660 wire withdrawal request has
8 been received." Why were you withdrawing money
9 Mr. Theodule?
10 A Fifth.
11 Q Again, on September 11, 2007 at 9:43 a.m.
12 there's an e-mail to you at
13 georgetheodule@yahoo.com. It says, "Dear Mr. George
14 L. Theodule, Your \$1,752 wire withdrawal request has
15 been received, and will be submitted for
16 processing." Why did you request this withdrawal,
17 sir?
18 A Fifth.
19 Q Was this CCC investor money, sir?
20 A Fifth.
21 Q Looking at the e-mail dated Thursday,
22 August 30th, 2007 at 9:52 a.m. It's addressed to
23 georgetheodule@yahoo.com. It says, "Dear Mr. George
24 L. Theodule, Your \$1,085 wire withdrawal request has
25 been received, and will be submitted for

Page 143

1 processing." Did I read that accurately?
2 A Fifth.
3 Q What did you do with this money,
4 Mr. Theodule?
5 A Fifth.
6 Q Was that CCC investor money, sir?
7 A Fifth.
8 Q Sir, there's an e-mail dated August 23rd,
9 2007 at 10:16 a.m. to georgetheodule@yahoo.com. It
10 says, "Dear Mr. George L. Theodule, Your \$1,100 wire
11 withdrawal request has been received, and will be
12 submitted for processing." Did I read that
13 correctly?
14 A Fifth.
15 Q You received all these e-mails, didn't
16 you, Mr. Theodule, all these e-mails that I'm
17 describing to you at georgetheodule@yahoo.com?
18 A Fifth.
19 Q And so was this money also CCC investor
20 money, sir?
21 A Fifth.
22 Q Sir, looking at the e-mail dated
23 August 10, 2007 to you georgetheodule@yahoo.com, it
24 says, "Dear Mr. George L. Theodule, Your \$2,000 wire
25 withdrawal request has been received." Did I read

Page 144

1 that accurately?
2 A Fifth.
3 Q Was that CCC investor money, Mr. Theodule?
4 A Fifth.
5 Q What did you do with that money?
6 A Fifth.
7 Q Sir, looking at the composite exhibit that
8 we'll label Exhibit 91, this is labeled Yahoo -
9 George Email 3. All of these e-mails went to
10 georgetheodule@yahoo.com but for the first one with
11 attachments. Is that, true, Mr. Theodule?
12 A Fifth.
13 Q And you received all these e-mails, true,
14 Mr. Theodule?
15 A Fifth.
16 Q Sir, if you look at the very last page,
17 that e-mail is dated Friday, July 13, 2007 at 12:32
18 p.m. -- oh, pardon me. No. This is why I do it.
19 Wednesday, July 11th, 2007 at 10:18 p.m., true,
20 Mr. Theodule?
21 A Fifth.
22 Q And the first dated e-mail to you is
23 Wednesday, August 1st, 2007 at 1:39 p.m., true,
24 Mr. Theodule?
25 A Fifth.

Page 145

1 Q These also describe optionsXpress trading
2 activity; is that true, Mr. Theodule?
3 A Fifth.
4 Q Sir, would you like to work off my copy
5 again?
6 A Uh-huh.
7 Q So looking at this e-mail that's dated
8 July 18, 2007 at 9:37 a.m., it's addressed to you,
9 georgetheodule@yahoo.com, true?
10 A Fifth.
11 Q It says, "Dear Mr. George L. Theodule,
12 Your \$3,117.30 wire withdrawal request has been
13 received, and will be submitted for processing."
14 Did I read that accurately?
15 A Fifth.
16 Q Where did this money come from,
17 Mr. Theodule?
18 A Fifth.
19 Q Was that investor money that had been
20 given to you?
21 A Fifth.
22 Q What did you do with that money, sir?
23 A Fifth.
24 Q What did you do with all of the money
25 that's described in Exhibit -- being traded in

Page 146

1 Exhibit 91 or going in and out of this account?
2 A Fifth.
3 Q Sir, I'm handing you what we'll label
4 Exhibit 92. It's entitled "Account Opening
5 Documents."
6 (Exhibit No. 92 was marked for
7 identification.)
8 MS. PAULOSE: Who just joined?
9 MR. PATRICK: This is Brad Patrick
10 again.
11 MS. PAULOSE: Mr. Patrick, you have
12 no right to be involved in this deposition, as
13 I told you earlier.
14 MR. PATRICK: Then we'll take that to
15 the judge now. I'm not going to stand by and
16 watch Mr. Theodule participate in another
17 deposition at which I was present with you when
18 I'm a noticed party when your notice of
19 deposition didn't include me, the cross-notice
20 of deposition did. I want to know what's going
21 on.
22 MS. PAULOSE: Mr. Patrick, you have
23 no right to interrupt this deposition. You are
24 not a party to this litigation, as I noted
25 previously. Your sole purpose here is to

Page 147

1 obstruct. You have not been involved in any
2 prior deposition in this case, as you well
3 know.
4 MR. PATRICK: Really? You and I were
5 not both in the deposition of George Theodule
6 in this cause number? Are you saying that I
7 was not in the deposition of George Theodule
8 with Gabrielle Alexis?
9 MS. PAULOSE: That was not the SEC's
10 deposition. That was the Receiver's
11 deposition.
12 MR. PATRICK: Is it this cause
13 number?
14 Madam Court Reporter, what is the cause
15 number this deposition is being taken under?
16 MS. PAULOSE: Mr. Patrick, I am not
17 being interrogated by you. We can certainly
18 call the Court, but --
19 MR. PATRICK: Let's call the Court
20 then. I'm not going to stand by and get
21 steamrolled. This is completely unacceptable
22 and your misrepresentation is really
23 unacceptable.
24 MS. PAULOSE: No, it's not a
25 misrepresentation. You're not a party to this

Page 148

1 underlying litigation.
2 MR. PATRICK: What would you like to
3 do?
4 MS. PAULOSE: I'd like to continue my
5 deposition and you can take it up with the
6 Court later.
7 MR. PATRICK: That's not going to
8 happen. If we're going to go forward right
9 now, I want to know what we're going to do
10 about contacting the Court, because you are --
11 this is unacceptable.
12 MS. PAULOSE: Is the Receiver still
13 on the line?
14 MR. KOROGLU: Yes.
15 MS. PAULOSE: Do you have a position
16 to state?
17 MR. KOROGLU: Again, the same thing.
18 This deposition was cross-noticed in the main
19 case in which, you know, lead counsel for the
20 SEC is deposing the witness. Mr. Patrick's
21 client is neither being deposed nor is a party
22 to the case in which this deposition was
23 noticed.
24 And so there is absolutely no basis under
25 neither the Federal Rules of Civil Procedure or

Page 149

1 the local rules of the Southern District
2 allowing him to participate and question -- and
3 take any questions or raise any objections or
4 further disrupt this deposition.
5 MR. PATRICK: Harris, is that you?
6 MR. KOROGLU: Yes.
7 MR. PATRICK: I'm sorry. So the
8 gentleman who was just speaking for the
9 Receiver is the person who sent me the
10 cross-notice of deposition. I'm listed on the
11 service list.
12 MR. KOROGLU: I understand that.
13 MR. PATRICK: I want to understand
14 how it is that I'm being asked to be excused
15 from the deposition in the first place.
16 MR. KOROGLU: It looks from the
17 service list that you were mistakenly added to
18 the list. But if you look at the docket of
19 this case -- I mean, this notice -- this
20 cross-notice could have been sent to 10,000
21 people from another case by accident. That
22 doesn't mean they actually have a right to
23 participate in the deposition if they were
24 attorneys. The bottom line is that you haven't
25 filed an appearance on the docket for this

Page 150

1 case.
2 MR. PATRICK: I beg your pardon.
3 Look at docket 33. I appeared in this case
4 before Ms. Paulose's notice of appearance was
5 filed, her substitution. I've been in this
6 case since February.
7 MR. KOROGLU: Well, I'm looking at
8 the docket right now and I don't see you as an
9 attorney listed for any party, whether a
10 plaintiff or defendant.
11 MR. PATRICK: Excuse me. Look at the
12 docket and look at docket number 33. I filed a
13 notice of appearance.
14 MR. KOROGLU: You filed a notice of
15 appearance.
16 MR. PATRICK: Oh, so that's not the
17 same as my being --
18 MR. KOROGLU: You don't represent any
19 party to this litigation.
20 MR. PATRICK: I sure am an interested
21 party.
22 MS. PAULOSE: Okay. An interested
23 party is not the same as a party to the
24 litigation, as you know, Mr. Patrick. You are
25 solely trying to obstruct this deposition, and

Page 151

1 we do not appreciate it.
2 You have no right to be here. There are
3 10,000 people -- investors -- who are also
4 interested parties to this litigation. They
5 have no right to be here either.
6 So I suggest you get off the line now
7 because you don't have a right to be here. You
8 are not a party to this underlying case.
9 MR. PATRICK: I would like the Court
10 to determine that.
11 MS. PAULOSE: Well, then, let's call
12 up the Court. But this is not going to count
13 towards my seven hours with Mr. Theodule.
14 Mr. Weigel?
15 MR. WEIGEL: Yes.
16 MS. PAULOSE: I'm going to be calling
17 the Court.
18 MR. WEIGEL: How are we going to do
19 this?
20 MS. PAULOSE: Well, we're going to
21 have to figure that out because there's no easy
22 mechanism to interrupt this deposition.
23 THE WITNESS: A lunch break?
24 MS. PAULOSE: I'm almost done,
25 actually.

Page 152

1 Okay. I'm going to end this call.
2 MR. WEIGEL: I would suggest that we
3 do the following -- I don't see any reason why
4 Mr. Patrick cannot listen to what's going on.
5 I would suggest that counsel for Plaintiff just
6 continue and finish her part of the deposition
7 with Mr. Theodule so that that part can be
8 concluded. And then -- you know, I'm not going
9 to be doing any cross-examination questions of
10 my own witness, my own client. And, you know,
11 at that point -- I presume we're taking a break
12 anyway before the Receiver's counsel starts. I
13 may be mistaken, but that was my assumption.
14 MS. PAULOSE: No. I think that I'm
15 going to get clarification right now. So let
16 me figure out a mechanism to get the Court on
17 the line, but we'll have to end this call since
18 this is my only line, okay?
19 MR. WEIGEL: If we're going to do
20 that, then I will mark time as far as --
21 MS. PAULOSE: No, Mr. Weigel, you
22 will not mark time because you orchestrated
23 this. How did Mr. Patrick get this number?
24 Because I did not give it to him. How did he
25 get it?

Page 153

1 MR. PATRICK: I got it -- you can ask
2 me directly, ma'am. I got it from Carol Greco,
3 the assistant to the gentleman who is
4 representing the Receiver right now. She's the
5 one who signed the cross-notice of deposition.
6 That's the reason -- I sent you an e-mail a few
7 moments ago that has the full paper trail on
8 all of this.
9 MS. PAULOSE: Well, clearly, I have
10 been deposing someone, so I haven't been
11 looking at my e-mails.
12 MR. PATRICK: I understand that.
13 MS. PAULOSE: No, this does not count
14 towards our time. I will figure out a way to
15 get in touch with the Court. We'll suspend
16 this deposition until we get clarification from
17 the Court. I'll figure out a way to do that
18 and get back in touch. We've got to end this
19 call, though. Bye-bye.
20 (A recess was taken.)
21 BY MS. PAULOSE:
22 Q Mr. Theodule, I handed you Exhibit 92,
23 account opening documents. Turning to the first
24 page of that document, it says, Change Life
25 Concepts, LLC, correct?

Page 154

1 A Fifth.
2 Q You were involved with Change Life
3 Concepts, true, Mr. Theodule?
4 A Fifth.
5 Q And do you see on this page where it says
6 4 of 15 of the document authorized person's
7 information the e-mail for georgetheodule@yahoo.com
8 with a Social Security number of 361-60-1582?
9 A Fifth.
10 Q And is that your name and signature also
11 listed as an authorized person for this account,
12 sir?
13 A Fifth.
14 Q It's giving you limited trading
15 authorization for Change Life Concepts, LLC, true,
16 Mr. Theodule?
17 A Fifth.
18 Q And, again, looking at this page that says
19 6 of 15, authorized person's information, it's your
20 name and signature on this document, true,
21 Mr. Theodule?
22 A Fifth.
23 Q And, again, on page 11 of 15 it's your
24 name and signature on this document, true,
25 Mr. Theodule?

Page 155

1 A Fifth.
2 Q Turning to the page that's labeled 12 of
3 15, this is your driver's license, Florida license
4 of Georgia Louis Theodule, a copy of it, true,
5 Mr. Theodule?
6 A Fifth.
7 Q Where did you get the money to trade in
8 this optionsXpress account, Mr. Theodule?
9 A Fifth.
10 Q Was that CCC money, Mr. Theodule?
11 A Fifth.
12 Q What did you do with that money, sir?
13 A Fifth.
14 Q Turning to what we'll label as Exhibit 93
15 in this case, Mr. Theodule. It has a label on front
16 that says account statements. These are account
17 statements for Change Life Concepts, LLC where you
18 had trading authority; is that true, Mr. Theodule?
19 A Fifth.
20 Q And the last page -- these are account
21 statements that go from January 1st, 2008 to
22 January 31st, 2008, is the first account statement.
23 And the last account statement goes from November 1,
24 2008 to November 28, 2008; is that correct,
25 Mr. Theodule?

Page 156

1 A Fifth.
2 Q This depicts account activity in Change
3 Life Concepts' optionsXpress account; is that true,
4 Mr. Theodule?
5 A Fifth.
6 Q To which you had access and control, true,
7 Mr. Theodule?
8 A Fifth.
9 Q What did you do with all this money,
10 Mr. Theodule?
11 A Fifth.
12 (Exhibit No. 93 was marked for
13 identification.)
14 BY MS. PAULOSE:
15 Q Mr. Theodule, handing you what we'll label
16 as Exhibit 94 in this case with a title page of
17 "Confirmations." These depict confirmations of
18 trades for optionsXpress accounts; is that true,
19 Mr. Theodule?
20 A Fifth.
21 Q And these were accounts that you
22 controlled and had authority over, true,
23 Mr. Theodule?
24 A Fifth.
25 (Exhibit No. 94 was marked for

Page 157

1 identification.)
2 BY MS. PAULOSE:
3 Q Handing you what we'll label as Exhibit 95
4 in this case. The title page says "Deposit and
5 Withdrawal Activity." This, again, is activity for
6 the Change Life Concepts account to which you had
7 access and control, true, Mr. Theodule?
8 A Fifth.
9 Q What did you do with this money,
10 Mr. Theodule?
11 A Fifth.
12 (Exhibit No. 85 was marked for
13 identification.)
14 BY MS. PAULOSE:
15 Q Handing you what we'll label as
16 Exhibit 96, Mr. Theodule, a series of e-mails that's
17 labeled "Army - George Emails" to
18 george.theodule@usarmy.mil. Is that your e-mail
19 address, Mr. Theodule?
20 A Fifth.
21 Q Is this another account that you opened at
22 optionsXpress, Mr. Theodule?
23 A Fifth.
24 Q Where did you get the money to open this
25 account from, Mr. Theodule?

Page 158

1 A Fifth.
2 Q Do you see on the last two pages of this
3 document that it's addressed to a Mr. George
4 Theodule at 1389 Stanwood Drive, No. 1 in San Jose,
5 California?
6 A Fifth.
7 Q Is that a place you've ever lived,
8 Mr. Theodule?
9 A Fifth.
10 Q Mr. Theodule, you took investor money
11 through CCC, true, sir?
12 A Fifth.
13 Q And you used that money for your own
14 personal gain, true, Mr. Theodule?
15 A Fifth.
16 Q You also took or authorized the withdrawal
17 of investor money from CCC that you used to enrich,
18 your family, your lovers, your friends, and your
19 associates, true, Mr. Theodule?
20 A Fifth.
21 MR. WEIGEL: Objection.
22 Mischaracterizes evidence.
23 BY MS. PAULOSE:
24 Q There was no legitimate purpose to what
25 you did with the investor funds you raised through

Page 159

1 CCC, true, Mr. Theodule?
2 A Fifth.
3 Q And you knew that --
4 MR. WEIGEL: Objection. Misstates
5 evidence.
6 BY MS. PAULOSE:
7 Q And you knew that at the time, didn't you,
8 Mr. Theodule?
9 A Fifth.
10 Q So from November 2007 to December 2008,
11 you raised money from CCC investors making false
12 promises that you never delivered on; isn't that
13 true, Mr. Theodule?
14 MR. WEIGEL: Objection as to form.
15 Misstates evidence.
16 THE WITNESS: Fifth.
17 BY MS. PAULOSE:
18 Q Mr. Theodule, who did you speak to besides
19 your counsel about this deposition?
20 A Fifth.
21 Q Did you call other people that you knew
22 were going to be deposed, Mr. Theodule?
23 A Fifth.
24 Q Did you try to influence their testimony
25 in any way?

Page 160

1 A Fifth.
2 MS. PAULOSE: Thank you,
3 Mr. Theodule. I have no further questions for
4 you.
5 THE WITNESS: Thank you very much.
6 MS. PAULOSE: Mr. Weigel, do you have
7 any questions?
8 MR. WEIGEL: I do not. Just for
9 housekeeping, Harris, how much time do you
10 need?
11 MR. KOROGLU: Thirty seconds.
12 MS. VAN VLIET: Well, actually, I
13 think -- this is Theresa Van Vliet of the law
14 firm of Genovese, Joblove & Battista. I
15 apologize. I've been on for a while here, but
16 I didn't want to interrupt the flow and --
17 MS. PAULOSE: Theresa, Mr. Theodule
18 has to leave fairly quickly.
19 MS. VAN VLIET: We're about to ask
20 one quickly.
21 MS. PAULOSE: Okay.
22 EXAMINATION
23 BY MS. VAN VLIET:
24 Q Mr. Theodule, do you recall my taking your
25 deposition on April 9th, 2009 in Atlanta?

1 A Fifth.
 2 Q Have you had an opportunity to review that
 3 deposition transcript?
 4 A Fifth.
 5 Q Was all the testimony to the extent you
 6 did provide any testimony given then true and
 7 correct to the best of your knowledge?
 8 A Fifth.
 9 Q Do you adopt it now?
 10 A Fifth.
 11 MS. VAN VLIET: I have no further
 12 questions. Thank you.
 13 MS. PAULOSE: Thank you,
 14 Mr. Theodule.
 15 THE WITNESS: The gentleman said he
 16 had one question, but he never got to him.
 17 MS. PAULOSE: They represent the same
 18 party, sir.
 19 THE WITNESS: Okay.
 20 MS. PAULOSE: So this deposition is
 21 concluded. Thank you for your cooperation.
 22 THE WITNESS: Thank you. Have a good
 23 day.
 24 (Deposition concluded at 1:51 p.m.)
 25

1 C E R T I F I C A T E
 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
 24
 25

GALA M. REZNICK, B-826

1 DISCLOSURE
 2 STATE OF GEORGIA
 3 COUNTY OF FULTON
 4 DEPOSITION OF: GEORGE L. THEODULE
 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 14, 2009
 GALA M. REZNICK, CCR-B-826

 Attorney for Plaintiff Date: _____

 Attorney for Defendant Date: _____

This Page Intentionally Left Blank

	\$40,000 (2) 70:25;91:9	102:16	17th (1) 139:12	20th (1) 43:1
\$	\$42,000 (1) 98:24	10176 (4) 12:9;35:22;37:21; 117:4	18 (2) 28:18;145:8	2108 (1) 12:6
\$1,000 (1) 131:9	\$5,000 (3) 113:11;132:4; 141:23	10th (1) 131:22	180 (2) 102:4;104:6	2191 (1) 40:10
\$1,085 (1) 142:24	\$50,000 (1) 123:15	11 (8) 28:18;29:2;62:7,8; 82:6;132:7;142:11;	1-866-PAY2YOU (1) 84:18	21st (1) 72:10
\$1,100 (1) 143:10	\$500,000 (1) 139:25	11:11 (1) 140:25	1-877-355-SIMS (1) 41:21	2295 (1) 45:10
\$1,500 (2) 131:20,25	\$52,000 (1) 98:25	11:22 (1) 141:6	18th (1) 40:11	22nd (6) 94:18;95:9;134:9, 19;135:12,21
\$1,752 (1) 142:14	\$600,000 (1) 89:16	11:23 (1) 72:10	190 (1) 45:10	23 (2) 24:10;29:15
\$10,000 (5) 87:8;95:22,25; 96:9;98:24	\$660 (1) 142:7	11:36 (1) 125:6	1st (4) 100:7;105:5; 144:23;155:21	23rd (3) 138:15,23;143:8
\$10,800 (1) 77:4	0	11:53 (1) 43:1	2	24th (3) 125:14;138:4; 141:6
\$100,000 (1) 58:12	010-009-811-0 (1) 32:1	1111 (1) 15:15	2 (5) 46:20;49:9;68:16; 101:22;140:14	25 (2) 54:22;55:10
\$126,516.75 (2) 121:13,17	0186-0048 (1) 129:21	11th (1) 144:19	2.1 (1) 54:19	25th (5) 73:16;77:22; 96:11,17,19
\$137,000 (3) 97:1,5,8	0553 (2) 137:11;138:17	12 (3) 28:6,6;155:2	20 (5) 15:6;28:7;55:1; 56:3;80:17	26 (2) 62:9;91:9
\$150,000 (3) 89:15;115:9,16	1	12/9/1960 (1) 117:10	200 (2) 102:23;103:5	270 (1) 102:15
\$18.3 (1) 28:25	1 (6) 14:21;56:11; 68:14;133:13; 155:23;158:4	12:31 (1) 138:24	2005 (2) 132:17,22	27th (2) 125:6;137:18
\$2 (3) 119:10;130:11; 136:7	1.0 (1) 51:20	12:32 (1) 144:17	2007 (32) 12:16;14:11; 35:19;70:23;84:11; 85:4,11;86:8,15; 87:1;88:15;128:9; 130:25;131:6,12,18, 22;132:2,8;140:24; 141:6,20;142:5,11, 22;143:9,23;144:17, 19,23;145:8;159:10	28 (1) 155:24
\$2,000 (3) 130:14,17;143:24	1.1 (1) 53:7	12:42 (1) 138:5	2008 (62) 14:7,9,9,11;40:11; 43:1;58:12;62:10; 70:25;72:10;73:16; 77:22;80:10;81:25; 82:5;90:4,15;91:10, 23;94:1,18;95:4,17; 96:6,11,17,19;100:7; 105:5,11,18;106:14, 18;107:10;114:24; 115:14;119:20,24; 121:24;125:6,14; 134:7,9,13,19; 135:12,21;136:3,15; 137:3,9,18;138:4,15, 23;139:12,22; 155:21,22,24,24; 159:10	29th (1) 114:24
\$2,300 (1) 131:2	1.3 (1) 54:3	12:46 (1) 131:22	2009 (4) 21:19;23:19; 58:13;160:25	2nd (2) 132:17;140:24
\$2,500 (1) 131:14	1/31/2007 (1) 118:1	12:47 (1) 77:23		3
\$20,000 (3) 70:23;87:8;97:2	1:39 (1) 144:23	127 (1) 43:23		3 (5) 100:7,7,17,17; 144:9
\$23.4 (1) 28:20	1:51 (1) 161:24	128 (1) 38:21		3:02 (1) 131:18
\$250,000 (2) 58:13;123:8	10 (4) 66:20;128:9; 131:12;143:23	12th (1) 57:22		3:44 (1) 131:6
\$263,000 (1) 120:6	10,000 (2) 149:20;151:3	13 (2) 106:14;144:17		3:54 (1) 137:9
\$263,210.90 (1) 120:1	10:03 (2) 7:3;135:12	1389 (2) 14:21;158:4		30 (2) 7:6;119:24
\$263,310.90 (1) 120:8	10:04 (2) 7:8;98:22	14 (3) 28:6;29:2;115:14		30075 (1) 14:18
\$27,000 (1) 80:15	10:13 (1) 134:9	15 (6) 28:11;57:17; 154:6,19,23;155:3		30078 (1) 12:7
\$275,000 (1) 138:6	10:16 (2) 141:20;143:9	152 (2) 24:3,8		30345 (1) 45:11
\$3,000 (1) 80:16	10:18 (2) 137:3;144:19	16 (2) 131:18;132:2		30th (6) 21:19;35:19; 131:6;132:21;137:9; 142:22
\$3,117.30 (1) 145:12	10:21 (1) 7:21	160 (1) 125:8		3156 (1) 14:1
\$300,000 (2) 89:15;123:2	100 (1) 136:18,21	16th (2) 80:10;82:5		
\$323,820 (1) 76:25		17 (3) 92:9;141:20;142:5		
\$4 (2)				

<p>31st (1) 155:22</p> <p>32 (1) 28:11</p> <p>33 (2) 150:3,12</p> <p>33139 (1) 15:12</p> <p>33319 (1) 14:14</p> <p>33414 (8) 12:10,20;13:16; 14:2;35:23;37:22; 40:11;117:5</p> <p>33462 (1) 15:16</p> <p>33467 (4) 15:20;38:22; 39:23;43:24</p> <p>35 (1) 57:20</p> <p>361-60-1582 (5) 23:1;24:14,22; 117:14;154:8</p> <p>3a (2) 30:9;74:19</p> <p>3b (1) 30:8</p> <p>3rd (2) 134:7,13</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 (4) 28:1,1;139:22; 154:6</p> <p>404-424-3956 (3) 19:3;20:1;22:15</p> <p>4279 (1) 14:17</p> <p>429 (1) 15:11</p> <p>4th (3) 95:17;130:25; 139:21</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 (1) 64:7</p> <p>5.0 (1) 56:10</p> <p>5.3.1 (1) 57:15</p> <p>5:10 (1) 132:8</p> <p>5:15 (2) 136:3,15</p> <p>5:40 (1) 125:14</p> <p>5:52 (1) 62:10</p> <p>50 (4)</p>	<p>53:10,16;102:5,11</p> <p>50-something (1) 127:20</p> <p>561-228-1635 (1) 18:13</p> <p>561-685-2508 (1) 98:4</p> <p>561-685-2580 (1) 18:18</p> <p>58 (2) 19:8,11</p> <p>59 (5) 20:8,12,13;21:5; 124:10</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 (1) 154:19</p> <p>60 (4) 23:10,14;53:10,16</p> <p>61 (2) 27:17,21</p> <p>6101 (2) 14:13;139:13</p> <p>62 (2) 29:9,13</p> <p>6260 (3) 135:15,24;137:5</p> <p>63 (2) 33:8,11</p> <p>64 (1) 34:3</p> <p>65 (4) 35:13,14;36:13,14</p> <p>66 (3) 37:8,12;57:21</p> <p>67 (2) 38:12,16</p> <p>678-908-0006 (3) 18:21;20:1;22:16</p> <p>68 (2) 39:10,16</p> <p>6801 (1) 39:22</p> <p>69 (2) 41:7,11</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 (4) 84:10;85:3;86:8, 15</p> <p>7.0 (1) 58:21</p> <p>7/22/2008 (1) 135:14</p> <p>7/23 (1) 78:5</p> <p>7:31 (2) 134:7,14</p> <p>7:32 (1) 21:19</p>	<p>70 (2) 42:19,23</p> <p>71 (2) 43:18,19</p> <p>72 (2) 44:23;45:6</p> <p>73 (2) 45:17,21</p> <p>74 (2) 46:10;47:1</p> <p>75 (2) 47:8,12</p> <p>76 (2) 47:22;48:5</p> <p>77 (2) 48:15,25</p> <p>78 (2) 49:22;50:5</p> <p>79 (2) 50:19,23</p> <p>7th (4) 85:11;87:1;96:6; 137:3</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8.3 (1) 59:12</p> <p>8.4 (1) 60:1</p> <p>8/7/2008 (1) 98:22</p> <p>80 (2) 72:6;73:5</p> <p>81 (2) 73:5,9</p> <p>82 (2) 97:13,16</p> <p>83 (2) 114:22,23</p> <p>84 (2) 116:21;118:24</p> <p>8461 (5) 15:19;17:6,20; 43:23;48:11</p> <p>85 (5) 15:3,3,5;119:5; 157:12</p> <p>86 (5) 15:3,5;124:11,12; 126:10</p> <p>8641 (1) 38:21</p> <p>87 (3) 15:3;126:14;129:7</p> <p>877-355-SIMS (1) 61:21</p> <p>88 (2) 129:10;133:9</p> <p>8807 (2) 125:9;137:22</p> <p>89 (4) 133:14,15,19;</p>	<p>140:10</p> <p>8th (2) 136:3,15</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 (3) 51:14;65:17; 119:20</p> <p>9:19 (1) 7:4</p> <p>9:37 (1) 145:8</p> <p>9:43 (1) 142:11</p> <p>9:52 (1) 142:22</p> <p>9:53 (1) 135:21</p> <p>90 (11) 76:13;81:18;84:2; 85:5,24;104:6;106:7; 113:4;114:10; 140:13,16</p> <p>9075 (2) 12:19;13:15</p> <p>91 (2) 144:8;146:1</p> <p>92 (3) 146:4,6;153:22</p> <p>93 (2) 155:14;156:12</p> <p>94 (2) 156:16,25</p> <p>95 (1) 157:3</p> <p>95118 (1) 14:22</p> <p>96 (1) 157:16</p> <p>97 (1) 28:24</p> <p>9th (2) 23:18;160:25</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p>abilities (2) 58:23;59:2</p> <p>ability (2) 12:2;77:16</p> <p>above (1) 30:10</p> <p>absolutely (1) 148:24</p> <p>accept (1) 132:23</p> <p>access (5) 33:2;44:19;76:19; 156:6;157:7</p> <p>accessing (1) 139:8</p> <p>accident (1)</p>	<p>149:21</p> <p>according (1) 62:19</p> <p>accordingly (1) 11:8</p> <p>account (68) 21:6;22:13;32:1; 77:1,5;79:17,18; 80:9;116:17,22,22; 118:5,9,19,20; 122:13;124:17; 125:9,25;126:20,25; 127:7,12;128:2,6,10, 13,16,18,24;129:20; 130:6;132:10,10,17, 23;134:2;135:14,23; 137:4,6,10,21;138:6, 16,17,20,25;139:4,8, 15,16;141:13;146:1, 4;153:23;154:11; 155:8,16,16,20,22, 23;156:2,3;157:6,21, 25</p> <p>accounting (4) 29:6,14;30:5; 31:22</p> <p>accounts (8) 29:1;32:5,14,18; 78:4;140:9;156:18, 21</p> <p>accredited (4) 56:14,21;57:2,5</p> <p>accurate (7) 59:6;62:3;71:13, 16;134:10,20;137:6</p> <p>accurately (62) 32:3;40:12;42:5; 43:25;49:3;51:16; 56:17;58:1,14;60:5; 61:1,22;62:19;63:13; 64:13;65:24;66:24; 68:20;70:6;72:11; 73:18;75:14;76:6; 77:2;78:8;79:21; 80:11,18;81:14; 98:25;101:2,13,23; 102:6,24;104:7,25; 115:11;117:5; 119:11;120:3; 125:11,18;126:21; 127:4;129:22; 130:12,19;132:14; 135:17,25;136:7,19; 137:11,23;138:18; 140:1;141:7,24; 143:1;144:1;145:14</p> <p>achieve (4) 56:15,23;60:4,10</p> <p>Acres (1) 39:23</p> <p>act (1) 64:8</p> <p>action (1)</p>
---	---	--	--	--

81:17 activities (1) 65:23 activity (4) 145:2;156:2; 157:5,5 actually (10) 36:16;43:15;64:6; 65:14;97:21;103:1; 108:22;149:22; 151:25;160:12 added (1) 149:17 address (52) 12:5,9,12,13,19; 13:16,19,25;14:4,5, 15,19,23,25;15:1,12, 16,21,23,24;17:19; 18:5;20:16,21;21:18; 22:8;35:22;36:1; 37:19,20,20,25; 38:19,19,19;39:21; 40:9;41:12;43:22; 44:2,5,6,7;45:10; 47:19,19;48:11,12; 72:8;117:3,7;157:19 addressed (18) 19:6;126:23; 127:1,2;132:12; 136:4,16;137:3,9,18; 138:15,24;139:12, 22;141:9;142:22; 145:8;158:3 addresses (1) 15:17 adjustments (2) 100:25;101:12 admirable (1) 75:11 Admissions (2) 33:13,25 admits (4) 28:2,7,12,19 admitted (1) 28:23 adopt (1) 161:9 Advent (1) 77:22 adversary (1) 110:16 advertise (1) 26:15 affect (1) 12:2 affidavit (1) 34:9 affiliated (2) 39:6;49:25 affiliation (1) 42:16 afternoon (1) 112:3	again (33) 31:14;44:6;46:2; 53:25;55:24;61:24; 65:7;67:25;69:22; 89:16;90:20;96:20, 23;101:8;102:20; 103:5;112:24;113:3, 7;129:13;135:23; 136:15;137:2; 140:19;141:3,16; 142:11;145:5; 146:10;148:17; 154:18,23;157:5 against (2) 109:24;110:16 agency (3) 28:13;40:20,24 Agenda (3) 73:10,17;82:4 agent (9) 37:20;38:20,25; 39:21;40:3,9;47:18, 18;49:12 ago (2) 76:1;153:7 agreement (4) 16:9;61:6;62:13; 67:9 Agreements (1) 64:11 ahead (2) 16:2;75:12 aid (1) 50:13 airline (1) 92:23 AirTran (1) 34:22 Airways (3) 31:14;46:7,13 al (1) 21:24 Alexis (4) 135:6,16,25;147:8 alleged (1) 123:16 allowing (2) 111:14;149:2 almost (2) 75:13;151:24 alongside (1) 52:4 Although (1) 68:8 Always (1) 54:3 Ambassador (2) 82:4;97:3 amended (1) 64:12 Amendment (6) 16:4,11,22,23; 17:14;33:23	Amendments (1) 16:6 America (1) 91:9 among (1) 22:5 amount (1) 120:5 and/or (2) 31:11;68:12 Andrea (1) 43:2 Angela (5) 91:20;97:13;98:1, 18;99:20 annually (2) 53:11,16 answered (1) 17:5 apologies (1) 132:23 apologize (2) 130:17;160:15 apologized (1) 96:20 appearance (4) 149:25;150:4,13, 15 appearances (2) 8:20,24 appeared (4) 109:18,21;111:23; 150:3 Appelman (1) 43:2 applicable (1) 64:20 application (8) 36:18;61:4,15; 62:14;69:16;116:22, 25;128:25 applies (1) 16:13 appointment (1) 57:18 appreciate (1) 151:1 approximately (2) 28:24;57:20 April (9) 23:18;91:22; 105:18;121:24; 125:14;131:18,22; 139:21;160:25 area (1) 56:15 Armando (1) 32:7 Army (1) 157:17 arrives (1) 7:17 Article (3)	40:8;65:2,18 articles (5) 37:14;44:25; 45:24;46:12;49:2 ASAP (1) 79:18 assert (1) 16:21 asserted (1) 33:23 asserting (1) 16:5 assertion (1) 25:1 asserts (1) 16:9 asset (1) 30:16 Assets (12) 29:15;30:11,23; 31:2,11,24;68:14,18; 69:4,7;88:7;89:4 assistant (2) 123:2;153:3 associate (1) 129:3 associated (3) 89:23;90:24;106:9 associates (2) 66:13;158:19 association (2) 41:17;79:2 assume (1) 11:7 assumption (1) 152:13 assured (2) 103:16;104:23 Atlanta (3) 7:8;45:10;160:25 attached (2) 30:10;100:3 attaches (1) 97:14 attachment (1) 36:17 attachments (4) 62:11,19;73:17; 144:11 attended (1) 84:14 attention (26) 24:10;27:25;28:5, 10,17;29:2,17,22; 30:8,19;31:10,22; 33:16;34:21;41:24; 43:14;49:8;51:19; 60:13;76:24;77:24; 97:19;100:23; 103:13;139:11; 140:12 attorney (5) 11:16,18,19;19:22;	150:9 attorneys (1) 149:24 August (12) 95:17;96:6,11,17, 19;106:14;132:17; 140:24;142:22; 143:8,23;144:23 authority (2) 155:18;156:22 authorization (1) 154:15 authorized (4) 154:6,11,19; 158:16 Auto (4) 43:6,17,22;44:11 Avenue (1) 15:11 average (3) 58:12,13,17 aware (10) 34:18,21,24;73:21; 74:2,6;79:7,10; 81:24;118:18 away (2) 75:13;81:9
B				
back (18) 7:18;28:17;74:12; 77:14,17;79:24;81:1; 87:18;90:4;91:17; 95:14;98:16;105:16; 112:16;113:14; 116:2,3;153:18 background (3) 25:5,10;59:9 Balan (1) 40:10 balance (6) 80:9,14;102:4,10, 15,23 Bank (15) 31:25;91:9; 119:10;130:11,17; 131:2,8,14,20,24; 132:4;136:7,18; 139:25;141:23 banking (2) 82:8,8 Barry (1) 21:22 based (9) 51:22;52:9,24; 63:2;70:11;86:14; 93:24;113:10;114:2 basically (3) 96:3;99:3;102:19 basis (11) 16:10;52:23; 53:14,21;58:3,6;				

59:20;60:7;71:10; 72:25;148:24 Battista (3) 7:13;9:11;160:14 Beach (2) 15:11;88:16 became (4) 73:21;74:2,6; 81:24 becoming (2) 74:7;101:20 beg (1) 150:2 begin (1) 9:15 beginning (2) 57:17;134:17 behalf (3) 7:13;9:6;23:15 behind (1) 36:19 belongs (1) 125:9 Below (1) 21:25 beneficial (1) 30:13 benefit (1) 31:2 Benoit (1) 32:7 Berthrum (2) 62:8;107:6 besides (1) 159:18 best (3) 11:3;84:23;161:7 Better (1) 103:14 billing (1) 34:10 bills (2) 34:19,25 birth (2) 117:10,11 bless (1) 99:13 blessed (3) 27:9;132:18;133:1 Bliss (4) 43:8;45:14,25; 46:3 blissful (2) 75:11,18 block (1) 73:10 board (1) 112:25 bonded (1) 101:21 booking (4) 57:18,21,23;58:4 bookings (1)	57:20 borrow (1) 72:2 both (1) 147:5 bottom (6) 44:11;64:6; 101:18;103:14; 114:25;149:24 bought (1) 121:5 Brad (3) 108:18,19;146:9 breach (1) 61:5 break (6) 11:10,11,13,23; 151:23;152:11 breath (1) 75:13 Brewster (13) 62:9;107:7,9,13, 23;108:2,6,10;113:3, 8,10,13,16 Brian (1) 21:21 brings (2) 54:22;55:1 broad (1) 68:9 brokerage (3) 29:1;32:18;132:25 brother (1) 94:16 Browning (1) 36:18 Brutus (1) 91:7 Build (3) 56:12,13,19 Builders (1) 34:24 bullet (5) 42:2,3;64:7;65:19; 66:20 bullets (3) 60:23;82:7,11 bunch (1) 21:10 business (18) 34:23;42:4;51:15; 52:17;55:3;56:4,12, 13,20;92:18,22,23; 109:7;114:14; 118:12;122:7;126:7; 139:8 businesses (1) 92:24 Buy (5) 48:19;49:3,10; 84:23;120:18 Bye-bye (1) 153:19	bylaws (5) 61:5;62:12;63:12; 64:11;66:22 C calendar (1) 12:17 California (5) 14:22;15:5,8;86:7; 158:5 call (21) 94:19,21;95:8; 96:7;109:6,16,25; 110:5,20,23,25; 111:14;112:1;125:8; 147:18,19;151:11; 152:1,17;153:19; 159:21 called (11) 8:8;12:23;20:23; 21:1;39:7;41:25; 94:1;95:18;106:17; 113:24;121:14 calling (9) 74:11;77:13;78:3; 81:16;82:20;105:15; 111:7,9;151:16 Calls (9) 78:13;95:3; 106:22;120:21; 121:2,7;123:20; 124:2,7 Calm (1) 103:15 came (10) 86:13;90:4;94:12; 97:5;107:13,16; 116:5;121:17; 122:23;124:4 Can (19) 14:8;16:20;23:8; 30:14;33:20;72:2; 78:1,6;109:6;110:3, 22;112:1;122:7; 130:9;134:17; 147:17;148:5;152:7; 153:1 capable (1) 104:24 Capital (22) 9:8;17:23,23;18:6, 7;21:24;32:2;35:18; 36:5,8,12;37:5; 38:18;43:5,7;51:14, 21,23;54:21;58:25; 97:9;105:23 Capital's (1) 106:10 card (2) 34:23,25 care (1) 98:21	Caribbean (3) 31:14;46:6,13 Carl (1) 32:7 Carmen (1) 21:22 Carol (1) 153:2 Caroll (1) 79:3 case (41) 16:17;19:9;23:4, 14;29:6,16;33:3; 39:16;41:11;42:24; 44:23;45:21;47:12; 48:5;51:13;62:7; 73:9;108:24;109:18, 22,23,24;110:13,14, 16,16;111:23,25; 133:14;147:2; 148:19,22;149:19, 21;150:1,3,6;151:8; 155:15;156:16;157:4 Cash (4) 60:2,4,11;120:24 catch (1) 27:2 cause (3) 147:6,12,14 cc (1) 21:21 CCC (135) 17:15,17;18:7; 25:20;26:2,2,9,13,15, 21,24;31:6,10,18; 32:18;35:2;39:4; 41:1;44:2;46:6;47:5, 20;48:1,13,18;51:4; 52:4;53:14;54:8,12; 55:1,6,25;56:19,23; 57:5,8;58:3,18; 59:20,23;60:7,10; 61:8,11;63:16,20; 64:15,19,23;65:8,13; 66:10,14,17;67:5; 69:1,3,10;70:15; 71:3,19;72:13;73:2; 74:12,21,23;76:20, 25;77:16;78:21; 79:11;80:21;82:12, 13;83:7,13,20;84:11; 86:14;88:20;89:8; 90:6,17;91:5,16; 94:13;95:10,22;98:2; 100:22,24;101:11; 104:23;105:4,15; 107:1;113:21; 114:13;116:5,18; 118:4,8,19;119:16; 120:5;121:5,17,21; 122:14,24;123:2; 124:4;126:1;127:8, 10;130:21;136:12,	24;137:14,25; 138:11,21;139:5,19; 140:6;142:19;143:6, 19;144:3;155:10; 158:11,17;159:1,11 CCC's (2) 71:14;113:23 CEO (3) 46:3;54:20;55:6 certain (1) 66:2 Certainly (2) 72:3;147:17 Change (8) 102:3;120:6; 153:24;154:2,15; 155:17;156:2;157:6 charge (1) 64:23 Charles (2) 21:19;22:1 chart (5) 70:2,22;71:11; 76:23,25 charted (1) 57:17 check (1) 62:15 checklist (2) 61:4;69:19 chronological (3) 134:6,23;141:4 Cimo (1) 21:22 Circle (3) 14:14;34:25; 139:14 City (1) 105:20 Civil (1) 148:25 claimed (2) 84:21;86:6 claiming (2) 53:14;71:3 clarification (2) 152:15;153:16 clarified (1) 110:2 clause (2) 64:23;66:6 clauses (1) 69:1 clear (2) 10:19;111:4 clearly (1) 153:9 client (5) 11:24;110:12,17; 148:21;152:10 clients (1) 78:3 Climate (1)
--	---	--	---	--

103:15 close (2) 124:25;129:3 closed (1) 79:18 Closing (1) 103:14 club (36) 42:4;43:9;61:4,5; 62:12,13,14,17; 63:12,16;64:9;65:23; 66:20;67:1,20,21; 68:10,13,15,17,18; 69:3;74:13,21;75:18; 77:22;82:5;83:20; 91:7;93:25;95:25; 96:13;99:24;113:24; 114:2,9 club/CCC (1) 79:20 clubs (25) 42:17;43:4,11; 61:12;63:6,7,17,21; 64:10,15,19;65:8; 67:11,11,15,23;69:5, 8,23;80:25;83:14; 95:10;113:18,20,23 Club's (1) 66:22 CM/ECF (1) 109:20 co-applicant's (1) 117:19 Code (4) 66:21,22;67:2,5 Colin (1) 105:19 collapse (3) 79:11;100:25; 101:11 column (1) 104:6 coming (1) 34:19 Commission (2) 8:2;33:1 Commission's (1) 33:24 Committee (2) 64:8;68:9 committees (1) 68:23 communicated (2) 98:11,12 communication (2) 74:16,20 communications (3) 27:5;70:19;75:6 community (1) 13:12 companies (5) 51:24;54:24; 55:15,17;84:22	company (16) 28:7;34:23;37:16; 39:18;41:25;43:17; 45:2,25;46:13;51:23; 54:19;86:7;121:11; 122:4;123:16,23 competitively (1) 26:12 Complaint (3) 27:12,14,22 complaints (1) 74:24 complete (2) 17:25;36:20 completed (3) 129:20;135:14; 137:21 completely (1) 147:21 compliance (7) 62:14;64:8,9; 67:21;68:9,10,22 comply (2) 64:15,19 complying (1) 65:14 composite (7) 125:3;126:14; 129:11;133:12,18; 140:14;144:7 composites (2) 124:20,23 Compound (1) 81:2 comprised (1) 57:23 Concept (2) 37:16;43:5 Concepts (15) 9:9;17:23;18:7; 35:18;36:5,8,9,12; 37:5;97:9;153:25; 154:3,15;155:17; 157:6 Concepts' (1) 156:3 Concern (1) 115:6 concluded (3) 152:8;161:21,24 condition (1) 106:5 conditions (1) 57:25 condominium (2) 122:17,23 conduct (1) 68:11 confer (2) 11:12,23 conference (5) 75:10;94:18,21; 95:3,8	confidence (2) 63:24;66:2 confirmations (2) 156:17,17 confirms (1) 137:5 Conflict (2) 65:18,19 conflicts (3) 66:9,13,16 confused (2) 134:11,13 confusing (1) 134:22 conservative (1) 60:3 Consortium (6) 18:6;32:2;38:18; 51:15;54:21;58:25 Consortium (5) 9:8;17:23;21:24; 43:7;51:22 Constitution (3) 16:7,22,24 constitutional (2) 17:2,13 contact (7) 20:3;22:6;74:22; 81:12;93:21;98:2,8 contacting (2) 81:10;148:10 contacts (2) 72:9,13 Contains (1) 60:22 continue (4) 101:1,13;148:4; 152:6 continued (6) 71:20;95:4;105:7; 108:14;112:13,20 continues (1) 75:5 continuing (3) 75:23;79:23; 105:12 Contreras-Martinez (1) 21:22 control (19) 30:14;31:6;32:6, 23;42:16;44:16,18; 45:14;46:6;47:5,25; 48:19;61:11,14; 63:16;65:7;83:9; 156:6;157:7 controlled (4) 29:1;80:5;83:13; 156:22 conversation (2) 90:13;98:21 convey (1) 71:20 cooperation (1)	161:21 copy (5) 19:9;135:9; 141:15;145:4;155:4 Corporations (12) 35:12;37:13; 38:17;39:15;44:25; 45:23;46:11;47:13; 48:6;49:1,7;50:24 correctly (23) 22:17,18;24:15; 28:3,8,15,20;30:17; 32:10,15,19;35:20; 51:25;52:6;53:11; 54:6;55:4;59:18; 69:16;103:2,18; 139:2;143:13 correspondence (1) 111:16 counsel (14) 7:5,9;8:14,16; 11:12;22:2;33:6; 34:9;109:23;112:7; 148:19;152:5,12; 159:19 count (2) 151:12;153:13 coupled (1) 58:23 course (2) 11:6;18:8 court (28) 8:5,21,23;9:20; 10:9,11;12:9,15; 13:22,23;22:6;29:6; 35:23;37:22;109:7; 112:12;117:4; 147:14,18,19;148:6, 10;151:9,12,17; 152:16;153:15,17 court-appointed (1) 9:7 cover (2) 34:8;126:14 Creative (25) 9:8,8;17:22,23; 18:6,6;21:24;32:1; 35:18;36:5,8,9,12; 37:5,16;38:18;43:5, 7;51:14,21;54:21; 58:25;97:9;105:23; 106:10 credit (4) 34:23,25;76:4; 98:25 criminal (1) 16:15 crossed-noticed (1) 110:14 cross-examination (1) 152:9 cross-notice (4) 146:19;149:10,20;	153:5 cross-noticed (3) 110:9,13;148:18 Crown (2) 82:4;97:2 current (7) 12:5;82:12,13; 102:4,10,15,23 currently (1) 121:4 curtail (1) 74:16 Custodian (1) 34:8 customer (1) 117:19 customer's (1) 117:20
D				
			Dan (1) 36:18 date (6) 35:19;72:9;78:5; 117:10,11;134:13 dated (34) 35:18;62:10; 73:15;100:6;114:24; 118:1;119:24;125:6, 13;128:9;131:5,11, 17,22;132:7,16,21; 134:7;135:11;136:2; 138:15,23;139:12, 21;140:24;141:5,19; 142:4,21;143:8,22; 144:17,22;145:7 dates (1) 14:10 David (1) 21:22 day (12) 27:9;76:3;87:4; 90:2;91:15;104:6,6; 112:22;115:7; 132:18;133:1;161:23 days (10) 76:13;81:19;84:2; 85:5,24;102:4,15; 106:7;113:4;114:10 deal (1) 63:7 dealing (2) 63:21;69:23 dealings (1) 67:15 dealt (2) 66:3;72:24 Dear (21) 119:9,25;129:18; 130:10,25;131:7,12, 23;132:3;135:12,22; 136:17;137:20;	

139:23;141:21; 142:6,13,23;143:10, 24;145:11 Debra (1) 38:6 December (12) 84:10;85:3,11; 86:8,15;87:1;88:15; 90:2;105:11;128:9; 141:6;159:10 decided (1) 119:20 decisions (1) 65:22 Declaration (2) 34:7;97:13 deduction (1) 80:17 deductions (1) 80:3 deeply (1) 111:4 Deere (1) 84:23 Defendant (4) 28:19;29:14; 33:11;150:10 Delisfort (8) 32:8,8,9,9;46:21, 23;93:21;96:7 delivered (1) 159:12 deluge (1) 74:24 demand (1) 79:23 demanding (3) 74:12;77:13;78:24 Department (13) 35:12;37:13; 38:17;39:14;43:16; 44:24;45:23;46:11; 47:13;48:6;49:1,6; 50:24 depends (1) 57:25 depict (1) 156:17 depiction (1) 71:13 depicts (3) 70:17,22;156:2 deposed (4) 23:4;110:12; 148:21;159:22 deposing (2) 148:20;153:10 deposit (18) 62:15;69:19; 98:24;119:10; 130:11,16,21;131:1, 8,13,19,24;132:3; 136:6,18;139:24; 141:22;157:4 deposited (6) 28:25;76:25;97:9; 118:4;119:13,19 deposition (46) 8:3;10:1;16:8,14; 18:8;19:9;23:16; 108:21,25;109:2,3,8, 19;110:9,15;111:6, 10,24;146:12,17,19, 20,23;147:2,5,7,10, 11,15;148:5,18,22; 149:4,10,15,23; 150:25;151:22; 152:6;153:5,16; 159:19;160:25; 161:3,20,24 deposits (4) 77:10;95:25;96:9; 118:18 describe (20) 21:13;49:3;55:17, 22;56:6;57:1;61:1; 62:18;72:11;73:18; 80:10;82:7;103:2; 125:10,18;127:4; 133:24;135:1; 137:23;145:1 described (6) 44:12;48:12; 55:24;77:5;113:20; 145:25 describes (12) 31:2;58:10;60:24; 62:23;76:23;77:9; 82:12,16;129:20; 137:21;138:17,25 describing (2) 135:20;143:17 description (5) 18:1;58:17;59:5; 129:16;134:10 desperate (1) 95:14 detail (3) 35:17;38:20;39:18 details (1) 17:15 determine (1) 151:10 determining (1) 68:10 Detra (5) 115:7;116:25; 119:6,9,25 Dieujuste (1) 43:1 different (1) 13:25 dime (1) 91:16 diplomatic (2) 93:2,8	dire (1) 81:25 direct (11) 24:9;30:7,13; 31:21;50:15;51:18; 74:22;77:24;97:19; 100:23;103:13 directed (1) 52:8 directing (17) 27:25;28:5,10,17; 29:1,17,22;30:19; 31:10;33:16;34:21; 41:24;43:14;49:8; 60:13;61:15;76:24 directions (1) 99:5 directly (2) 98:12;153:2 director (5) 49:9,19;51:10; 54:24;55:14 disadvantaged (1) 88:6 discretion (1) 68:9 discuss (1) 89:23 discussed (1) 43:4 Discussion (1) 7:19 disrupt (1) 149:4 disseminated (1) 52:17 distributed (1) 100:13 District (1) 149:1 diverted (1) 114:13 Division (12) 35:12;37:13; 38:17;39:15;44:24; 45:23;46:11;47:13; 48:6;49:1,7;50:24 docket (7) 29:15;149:18,25; 150:3,8,12,12 document (32) 21:16;24:3;27:23; 29:19;34:7;36:15; 39:14;40:8;41:21; 45:3,22;51:13,19; 52:8;62:18;63:11,24; 65:18;67:9,19,22; 69:15;102:3;121:21, 25;125:13;128:21; 153:24;154:6,20,24; 158:3 documented (1) 115:17	documents (9) 21:10;26:21,24; 33:2;75:6;97:14; 127:25;146:5;153:23 dollar (3) 37:5,16;43:5 dollars (2) 87:4;115:9 Dominique (8) 72:20;73:12,21; 75:16;77:23;78:22; 80:9;84:14 done (3) 135:5;140:8; 151:24 Dorothy (3) 32:8;46:21;98:21 Double (20) 50:1,17;71:4; 78:12;84:2;85:11,24; 87:14;89:11,15,16; 90:16,18;93:17; 102:20;105:23; 106:1;108:11;113:4; 114:10 doubled (4) 78:6,25;81:18; 87:10 Doubling (2) 70:25;76:13 down (6) 10:11;42:3;60:2; 101:18;120:24; 124:11 dpasby@yahoo.com (2) 119:5,25 draft (2) 52:17;100:10 Dream (1) 96:13 Drive (3) 14:21;15:9;158:4 driver's (1) 155:3 drop (7) 109:15,25;110:5, 20,22,24;112:1 dropping (2) 110:23;111:22 DSDA (1) 79:3 Duckens (1) 32:8 due (2) 79:18;82:12 duly (1) 8:9 Dupe (1) 32:14 DuPont (7) 12:20,21,23;13:8, 15,23,24 during (14) 12:17;14:9;18:7; 23:16;94:21;95:4,15; 96:19;106:18; 107:20;108:21; 112:24;114:8;128:25	Duties (3) 65:2,3,15 <hr/> E <hr/> earlier (4) 19:6;43:4;48:13; 146:13 Early (7) 31:12;50:25;51:6; 106:14;121:10,14; 123:23 easier (1) 135:9 easiest (1) 97:20 easy (1) 151:21 Economic (1) 103:15 educational (1) 25:5 Edwige (1) 32:7 efforts (1) 69:22 eight (5) 60:23;67:20; 97:22;115:8;124:25 either (1) 151:5 electronic (4) 37:14;44:25; 45:24;46:12 Elian (1) 32:14 Elite (3) 31:14;44:19;45:2 else (5) 13:9;66:7;83:6; 91:16;116:2 Elza (11) 129:19,21,24; 130:10;131:1,7,13, 18,23;132:3,8 Email (1) 144:9 e-mail (71) 7:5;20:13,15,20, 23;21:1,25,25;22:4, 8,12;42:25;62:8,19; 70:18;72:6,16,21; 73:11;76:23;77:21; 78:3;80:8,14,14; 81:7;98:4,18;99:9; 119:8,24;125:4; 127:1,2;129:13; 130:25;131:5,11,17,
--	---	---	---

22;132:7,16,21; 133:1,13;134:18; 135:11,20;136:2; 137:2,8,17;138:3,14, 23;139:11,21; 140:14,19;141:19; 142:4,12,21;143:8, 22;144:17,22;145:7; 153:6;154:7;157:18	entity (8) 31:5;40:18;44:15, 18;46:5;47:25; 48:18;121:14 entrepreneur (2) 58:24;59:3 entrust (1) 88:6 entrusted (1) 138:12 entry (1) 29:15 equal (1) 102:23 equals (3) 102:4,5;103:2 equity (3) 89:4,8;91:4 escorted (1) 91:8 establish (1) 66:21 estate (1) 106:2 et (1) 21:24 ethical (2) 66:4;67:22 Ethics (4) 66:21,22;67:2,6 Evelyn (1) 88:13 even (3) 60:24;95:13; 123:23 event (1) 16:17 events (1) 109:13 everyone (2) 8:22;75:12 evidence (36) 35:6;42:13;52:13, 20;53:3,18,24;54:15; 57:12;68:4;71:7,23; 73:25;75:3;76:17; 81:3,22;83:16,24; 84:8;85:21;86:3; 88:9,22;107:4; 114:17;115:21; 116:12;122:11,21; 123:6,13,20;158:22; 159:5,15 exact (1) 14:10 EXAMINATION (2) 8:11;160:22 examined (1) 8:9 example (2) 10:16;27:4 examples (1) 68:11	Exchange (2) 8:1;32:25 Excuse (3) 16:1;21:8;150:11 excused (1) 149:14 Executive (2) 51:20;64:8 exercised (2) 61:12;63:16 ex-fiancee (3) 38:9;116:14; 117:24 Exhibit (103) 19:8,11;20:8,12, 13;21:4,5;23:10,14; 27:17,21;29:9,13; 30:10,20,22;31:22, 24;33:7,8,11;34:3; 35:13,14;36:13,14; 37:8,12;38:12,16; 39:10,16;41:7,11; 42:19,23;43:18,19; 44:23;45:6,17,21; 46:10;47:1,8,12,22; 48:5,15,25;49:22; 50:5,19,23;51:14; 62:7,8;72:6;73:5,9; 75:5;97:13,16;99:8; 114:20,21,23; 116:21;118:24; 119:5;124:10,12; 125:3;126:10,14; 129:7,10,11;133:9, 12,14,15,19;140:10, 13,15,16,24;141:5; 144:7,8;145:25; 146:1,4,6;153:22; 155:14;156:12,16, 25;157:3,12,16 existed (1) 66:9 exists (1) 65:20 expectations (1) 75:13 experience (12) 25:14,20;54:22; 55:2,10;56:3,6; 58:23;59:2,16,23; 92:10 expertise (3) 54:25;55:20,22 explain (1) 17:12 extending (1) 65:8 extent (5) 16:13;28:12; 87:17;111:16;161:5 eyes (1) 130:18	F Fabre (6) 137:10;138:5; 139:1,7,13,16 face-to-face (1) 92:3 fact (41) 22:25;24:19,21; 30:4;39:3;40:23; 42:10;43:11;50:15; 53:21;54:12;57:4,7; 58:6;59:23;60:10; 64:15;66:6,12;67:1; 68:23;71:10;74:7,23; 81:18;83:10,13,19; 84:1,5;85:23;90:1; 91:4,12,93;25;94:15; 98:8;103:22;111:22; 114:12;123:22 factual (4) 53:13;58:6;60:7; 71:10 fails (1) 13:11 fairly (2) 133:18;160:18 faith (1) 30:15 false (5) 71:20;85:16,25; 103:11;159:11 familial (1) 65:21 familiar (5) 12:9,19;13:16; 27:11;117:23 family (4) 66:12;97:6; 113:17;158:18 far (1) 152:20 February (3) 107:9;115:14; 150:6 federal (2) 16:17;148:25 fee (7) 102:5,6,11,17,24; 103:1,2 feel (2) 11:11,22 fees (3) 80:4;89:23;90:23 few (2) 10:4;153:6 fictitious (2) 35:17;36:19 Fifth (661) 16:4,6,21,25;17:8, 9,14,19,25;18:2,3,9, 10,14,15,19,23;19:4;	20:7,17,18,22,25; 21:3,7;22:3,10,19,20, 24;23:2;24:16,17,23, 24;25:1,6,7,11,12,16, 17,22,25;26:3,5,8,11, 14,16,19,22,25;27:3, 7,10,13,16,24;28:4,9, 16,22;29:4,8,20,25; 30:3,6,18,25;31:4,8, 16,20;32:4,12,17,21, 24;33:4,15,23;34:2, 20;35:1,4,21,25; 36:3,6;37:7,18,24; 38:2,5,8,11,23;39:2, 5,9,20,24;40:2,6,13, 17,22,25;41:3,6,15, 19,23;42:2,9,14,18; 43:10,13;44:1,4,9,14, 17,21;45:5,12,16; 46:4,8,15,18,22,25; 47:7,16,21;48:3,10, 14,21;49:5,11,14,17, 21;50:3,8,11,14,18; 51:2,5,8,11,17;52:2, 7,14,21;53:4,12,19, 25;54:7,11,16;55:5, 8,12,16,18,21,23; 56:1,5,8,18,22,25; 57:3,6,10;58:2,5,8, 15,19;59:4,7,10,19, 22,25;60:6,9,12; 61:2,7,10,13,18,23; 62:2,5,21,25;63:4,9, 14,18,22;64:1,4,14, 17,21,25;65:6,12,16, 25;66:5,8,11,15,18, 25;67:3,7,13,17,24; 68:5,21,24;69:2,6,9, 11,13,17,21,25;70:7, 10,13,16,21,24;71:2, 8,12,15,18,24;72:12, 15,18,22;73:1,4,13, 19,23;74:5,10,14,18; 75:1,8,15,20,25;76:7, 11,15,21;77:3,7,11, 15,19;78:9,15,20,23; 79:6,9,13,22,25;80:6, 12,19,23;81:4,15,20; 82:2,10,15,19,24; 83:2,5,8,12,17,22; 84:4,13,16,20,25; 85:2,7,9,13,15,19; 86:4,10,12,16,24; 87:2,6,9,13,16,20,23; 88:1,4,10,14,18,23; 89:2,6,10,13,18,22, 25;90:3,7,10,14,19, 19,19,19,22,25;91:3, 6,11,14,18,21,24; 92:2,5,8,11,13,16,20, 25;93:4,6,10,13,16, 19,23;94:2,5,7,11,14, 17,20,24;95:2,7,11,
--	--	---	---	---

16,20,23;96:2,5,10, 15,18,22,25;97:4,7, 11;98:7,10,14;99:2, 6,12,16,19,22;100:1, 4,9,12,15,20;101:14, 17,24;102:1,7,13,18, 21,25;103:4,7,9,12, 19,21,24;104:2,8,11, 15,18,21;105:1,3,6, 10,13,17,21,25; 106:4,8,12,16,20,24; 107:2,8,12,15,19,22; 108:1,5,9,13;112:23; 113:2,6,9,12,15,19, 22;114:1,4,7,11,15; 115:2,5,12,15,19,25; 116:4,7,10,16,19,24; 117:2,6,9,12,17,22, 25;118:3,7,11,14,17, 22;119:7,12,15,18, 22;120:4,9,12,15,20; 121:1,6,12,16,19,23; 122:2,5,9,15,19,25; 123:4,11,18;124:1,6; 125:12,20,24;126:3, 6,9,18,22;127:6,9; 128:19;129:6,17,23, 25;130:3,8,20,23; 131:4,10,16,21; 132:1,6,11,15,20; 133:3,6,8,23;134:1,4, 21;135:2,4,7,18; 136:1,8,11,13,20,23; 137:1,7,13,16,24; 138:2,8,13,19,22; 139:6,10,18,20; 140:2,5,7,11,22; 141:2,8,11,14,25; 142:3,10,18,20; 143:2,5,7,14,18,21; 144:2,4,6,12,15,21, 25;145:3,10,15,18, 21,23;146:2;154:1,4, 9,13,17,22;155:1,6,9, 11,13,19;156:1,5,8, 11,20,24;157:8,11, 20,23;158:1,6,9,12, 15,20;159:2,9,16,20, 23;160:1;161:1,4,8, 10	final (1) 57:24 Finance (4) 54:23,23;55:10,14 financial (6) 59:9;62:16;75:17; 79:12;82:13,14 financially (1) 88:6 Finding (1) 103:15 fine (3) 16:18;111:25; 120:13 finish (2) 10:22;152:6 firm (1) 160:14 first (32) 8:8;10:7;20:15; 31:25;40:3;51:21; 57:18,19;58:22;65:4, 19;66:20;68:8;74:20, 21;77:25;82:7; 90:12;119:4;125:4, 23;128:1,23;129:13; 133:20;134:18; 140:19;144:10,22; 149:15;153:23; 155:22 five (2) 56:9;60:23 Florida (45) 9:11;12:10,20; 14:2,14;15:12,16,20; 17:21;35:11,23; 36:17;37:12,15,22; 38:16,22;39:14,17, 23;40:9,10;43:15,16, 24;44:24;45:1,22,25; 46:10,13;47:12;48:5, 25;49:6;50:23;51:15, 22;84:12;88:16; 114:2;117:4;126:24; 139:14;155:3 Flow (4) 60:2,4,11;160:16 Fnivose (1) 125:4 fnivose@gmailcom (2) 125:7;137:19 folks (1) 72:23 follow (1) 67:11 followed (1) 49:2 following (6) 79:17;95:8; 129:19;135:13; 137:20;152:3 follows (2) 8:10;68:13	Forecast (2) 57:15;58:11 Forecasting (1) 57:22 foregoing (1) 30:9 foreign (2) 129:1,2 Forex (1) 32:19 form (7) 34:13;61:16; 70:17;75:21;76:4; 115:24;159:14 former (5) 12:13;14:5;15:1; 37:25;117:7 forms (3) 54:5,10,13 forth (1) 30:9 Forward (5) 72:9;80:13;86:13; 111:15;148:8 forwarded (3) 62:8,22;99:9 forwards (1) 80:9 foundation (1) 53:18 four (7) 60:23;64:5;72:21; 97:21;98:15;119:4; 130:9 four-page (2) 45:2,22 Fourteenth (3) 16:6,11,23 fourth (2) 44:12;53:8 frankly (1) 75:14 Fraud (5) 68:16;69:10,12; 103:25;104:19 free (4) 11:11,22;41:20; 132:9 freedom (1) 62:16 Friday (6) 21:18;62:9;77:22; 125:6;137:18;144:17 friends (7) 26:17,18,18;66:13; 97:6;113:17;158:18 front (30) 20:11;21:4;23:13; 24:4;27:20;29:12; 34:6;35:11;37:11; 38:15;39:13;41:10; 43:15;44:22;45:20; 46:9;47:11;48:4,24;	50:4,22;51:12;62:6; 72:5;73:8;114:19; 116:20;119:2;124:9; 155:15 fulfilled (1) 82:22 full (7) 9:20;10:8;64:7; 66:20;68:8;77:25; 153:7 fully (1) 101:20 functions (1) 65:10 fund (3) 30:16;51:4;118:15 funded (1) 31:18 funding (1) 132:23 funds (15) 30:11;44:19; 61:25;76:19;99:4; 106:6;114:10;116:5; 121:18;122:24; 126:21;128:3,6,13; 158:25 further (6) 17:15;21:14;60:2; 149:4;160:3;161:11 future (2) 57:22;101:21	31:1;32:10,15;33:11, 20;38:24;43:5; 54:20;76:2;80:16,20; 98:21,23;99:10,14; 115:3,7;117:1; 125:10;126:19,24; 127:2,3;128:2,21; 129:12,21;133:13; 135:12,15,22,24; 136:4,17;137:10; 139:13,23;140:13; 141:21;142:6,13,23; 143:10,24;144:9; 145:11;147:5,7; 157:17;158:3 G-e-o-r-g-e (1) 9:21 George's (1) 77:1 georgetheodule@usarmymil (2) 20:24;157:18 georgetheodule@yahoocom (36) 20:21;21:6,18; 22:9,13;72:8;73:15; 98:5;99:10;125:7,15; 132:13;133:20; 134:8;135:22;136:5, 16;137:4,19;138:4, 16,25;139:23; 140:21,25;141:10, 21;142:6,13,23; 143:9,17,23;144:10; 145:9;154:7 Georgette (1) 32:9 Georgia (6) 12:6;14:18;32:1; 45:11;137:22;155:4 Gerrard (1) 32:7 giant (1) 73:10 gift (5) 114:23;115:10,17; 116:9;121:25 given (4) 21:9;91:16; 145:20;161:6 giving (2) 17:5;154:14 Gmail (2) 125:3;126:14 God (1) 99:13 goes (7) 58:11;65:3;76:1; 80:13;104:3;134:9; 155:23 Good (12) 7:22,23;9:3,5,12, 13;30:15;48:19;49:3, 10;130:18;161:22 Good-bye (1)
G				
fifty (1) 115:9 Figure (7) 128:22;129:1,3; 151:21;152:16; 153:14,17 file (2) 29:6;35:18 filed (7) 27:14;33:5;40:11; 149:25;150:5,12,14 filing (2) 29:23;111:25	fifty - Good-bye (8)	Gabrielle (4) 135:6,16,25;147:8 gain (4) 68:19;104:5,16; 158:14 gains (3) 102:5,11,16 GameStop (1) 84:23 gave (20) 13:17;19:22; 23:18;29:21;41:22; 61:8;63:6,15;67:10; 84:17;89:14;113:11; 114:5;115:16,18; 116:9;121:13,21; 122:16;123:1 general (3) 62:13;79:2;92:4 Genovese (3) 7:13;9:10;160:14 gentleman (3) 149:8;153:3; 161:15 GEORGE (62) 8:7;9:21;16:1; 18:2,9,14,22;20:5,14, 18;21:17;30:22;	fifty - Good-bye (8)	Min-U-Script®

112:5 Google (1) 84:23 Gousse (1) 79:1 governed (1) 80:24 governmental (2) 28:13,14 graph (5) 53:7,8;70:2,4,5 great (1) 75:10 greater (2) 52:5,5 Greatest (1) 101:19 Greco (1) 153:2 Green (1) 39:22 ground (3) 10:4;123:23,24 Group (4) 47:6,14;87:25; 104:24 grow (4) 53:9,14;101:1,13 growing (1) 105:4 growth (5) 57:17,19;59:17,24; 70:22 guaranteed (4) 84:1;85:4,23; 93:14 guarantees (2) 17:2;93:24 guidelines (3) 62:13;63:5;67:20	126:4 happy (1) 135:8 Harris (6) 7:12,15;9:9,12; 149:5;160:9 head (7) 10:16;18:6;50:6; 94:8,12;99:23,24 headquarters (3) 17:16,18,22 heard (3) 8:19;14:20;79:19 hearing (1) 97:15 hedging (1) 106:3 held (1) 30:12 Hello (1) 79:15 help (11) 26:23;30:10,21; 31:23;42:1;52:9; 60:14;81:11;97:23; 101:4;134:18 helped (5) 39:25;43:12;51:4; 93:25;100:10 Here's (1) 43:3 herself (1) 62:23 Hi (1) 75:10 higher (1) 57:23 highlighter (1) 72:2 highly (3) 54:4,8;110:6 Hightower (1) 115:14 himself (1) 76:3 hire (3) 26:17;54:3,8 hired (3) 26:4,6;94:6 hiring (2) 26:9;65:24 hold (2) 7:16;84:11 Hollywood (3) 113:24;114:2,9 Hollywood's (1) 114:6 home (15) 15:24,25;17:21; 31:2;37:25;39:3; 44:2;47:20;48:1,7, 13;89:5,8;91:5;117:7 Homes (3)	48:19;49:3,10 honor (3) 94:23;95:5;96:20 hopkins@flsduscourtsgov (1) 21:21 hosted (4) 94:18;95:3,8; 96:12 Hotel (3) 105:19;107:10,14 hotels (1) 92:15 hours (1) 151:13 house (3) 120:19,25;121:4 housekeeping (1) 160:9 Houstan (1) 32:8 http//igotsimscom/ (1) 41:13 Hugo (1) 32:14 humble (1) 57:8 hundred (1) 115:9 hurley@flsduscourtsgov (1) 21:20 Hypoluxo (1) 15:15	28:12 important (3) 10:13;59:13;63:20 import-export (1) 92:23 improper (1) 68:17 inappropriate (1) 110:6 Inc (5) 47:6,14;49:10; 50:25;51:6 include (2) 73:17;146:19 included (3) 61:14;67:19; 111:24 includes (6) 37:14;45:22;61:3; 62:11;73:20;75:5 including (19) 11:12;22:5,8; 25:19;31:12;32:6; 61:3;67:5;68:16,25; 72:7,19;73:14;78:22; 79:1;92:22;94:22; 106:22;107:17 income (2) 53:9,15 incorporation (1) 49:2 incorrect (1) 22:14 increase (1) 59:15 indeed (1) 78:6 indented (2) 82:7,11 independent (3) 40:20,23;41:4 independently (1) 61:25 indicated (1) 128:25 indicates (1) 132:8 indicating (1) 101:6 indirect (1) 30:13 individually (1) 30:12 individuals (5) 22:5;54:4,9;93:8; 114:13 influence (2) 65:22;159:24 information (11) 20:4;22:7;33:2; 41:25;43:3;52:9; 98:9;111:7,9;154:7, 19	initial (3) 21:25;85:5;99:9 initially (1) 98:16 insight (3) 54:4,9,12 insisted (1) 115:23 instruct (1) 17:8 instructed (2) 98:22;123:9 instruction (1) 19:22 instructions (2) 63:2;75:24 instructs (1) 11:20 insurance (2) 123:16,22 insured (1) 101:21 interest (8) 30:13;65:18,19,21; 66:9,13,17;111:14 interested (3) 150:20,22;151:4 interrogated (1) 147:17 Interrogatories (3) 33:13,18,25 interrupt (3) 146:23;151:22; 160:16 interview (1) 26:12 into (9) 54:4,9,13;68:1; 77:1,5;94:25;118:4; 127:12 introductory (2) 26:21,23 invest (9) 78:6;80:3;88:20; 89:8;90:1,8;91:2,5; 107:24 invested (7) 84:22;86:13;87:3, 7;104:4,16,24 investing (14) 54:5,10,13;57:5,8; 87:11;90:6,16;92:10, 15,18,22;105:22; 106:2 Investment (52) 39:7,18;42:17; 43:4,9,11;57:15,17; 58:11,12,13,17;59:9, 16;61:12;62:11,12; 63:6,11,17;64:10; 65:8;67:11;69:3; 70:6,23;77:22;80:25; 82:5;83:14,20;85:5;
H		I		
hair (1) 88:16 half (1) 31:9 Hamblin (1) 14:1 hand (1) 8:5 handed (2) 40:15;153:22 handing (9) 19:7;42:22;97:12; 126:13;133:12; 146:3;156:15;157:3, 15 hands (1) 76:5 happen (1) 148:8 happened (1)		idea (2) 78:11,18 ideas (1) 51:25 identification (36) 19:12;20:9;23:11; 27:18;29:10,15;33:9; 34:4;35:15;37:9; 38:13;39:11;41:8; 42:20;43:20;45:7,18; 47:2,9,23;48:16; 49:23;50:20;68:17; 73:6;97:17;118:25; 126:11;129:8; 133:10,16;140:17; 146:7;156:13;157:1, 13 identified (1) 17:17 immediate (1) 129:2 immunity (1) 93:2 Implementation (1) 56:10 implication (2) 111:4,17 implies (1)		

86:7;89:20,24;90:24; 92:4;93:15,25;95:10, 22;96:13;99:23,24; 106:10,19;113:14, 17,20,23,24;114:9 investments (9) 31:10;63:25; 65:23;66:3;71:17; 74:9;85:11;95:19; 101:22 Investopedia (5) 94:1,4;97:1;98:19; 99:25 Investopedia's (1) 95:19 investor (39) 25:15,21,24;31:18; 55:2;56:3;57:2; 61:16;76:20;86:17, 22;87:17;88:12; 91:19;96:9;99:4; 105:18;107:6; 114:10;116:5; 119:16;121:5,17; 126:1,4;127:10; 130:21;136:12,24; 137:14;140:6; 142:19;143:6,19; 144:3;145:19; 158:10,17,25 investors (63) 25:20,23;40:19; 41:22;42:5;50:17; 56:14,21;57:5;61:9, 25;62:4;63:7,24; 66:2;68:1;69:24; 70:9,19;71:21;74:7, 11,24;76:9;77:13; 78:11;79:23;80:25; 81:16;82:20,25;83:3, 6,11;84:2;85:4,24; 86:13;87:25;88:3; 94:22,25;95:9,13; 96:23;100:18;102:9; 103:6,22;105:8,12, 15;107:24;108:2,6, 10,15;112:13,21; 114:6;124:5;151:3; 159:11 investor's (2) 87:14,19 invitation (1) 62:16 invited (2) 76:2;132:9 invoking (3) 17:1,11,13 involve (1) 137:25 involved (4) 34:11;146:12; 147:1;154:2 involvement (1)	35:9 Isabelle (1) 79:4 Island (1) 14:17 Issue (3) 100:7,17;109:19 issues (1) 75:7 italics (1) 28:14 item (1) 59:13 IV (1) 40:8	Julius (2) 126:15;127:7 julius@theodule@gmailcom (1) 126:16 July (16) 72:10;73:16; 77:22;119:20,24; 132:24;134:9,19; 135:12,21;136:3,15; 137:3;144:17,19; 145:8 jumping (1) 136:2 June (17) 73:16;80:10;90:4, 15;91:9;94:18;95:4, 9;125:6;130:25; 132:21;137:9,18; 138:4,15,23;139:12	148:14,17;149:6,12, 16;150:7,14,18; 160:11 Krissy (1) 123:2	left (3) 60:24;101:19; 104:6 left-hand (1) 102:2 legal (3) 34:19,25;81:17 legitimate (5) 118:12;122:6; 126:7;139:7;158:24 Lenox (1) 15:11 Leone (2) 92:18;93:2 less (1) 102:4 letter (2) 34:8;110:21 letters (1) 73:10 level (1) 66:2 liability (7) 37:15;39:17; 43:17;45:1,25;46:13; 51:23 license (2) 155:3,3 life (9) 27:6;82:17;99:14; 153:24;154:2,15; 155:17;156:3;157:6 lifestyle (1) 118:15 limited (9) 37:15;39:17; 43:16;45:1,25;46:13; 51:23;68:16;154:14 Linda (1) 62:9 line (10) 7:11;21:21;24:10; 31:1;99:13;148:13; 149:24;151:6; 152:17,18 liquidate (1) 89:7 liquidated (1) 91:4 liquidity (1) 82:12 list (9) 30:11;62:15;65:3; 72:9,13;98:2;149:11, 17,18 listed (30) 36:4;37:21,21; 38:3,21,25;41:20; 43:23;44:5,6,10; 45:3;46:2,16,19; 47:17;48:7,11;49:8, 13,18;51:9;53:9; 59:6;100:16;109:22;
	J			
	jackie@n2cccom (1) 80:8 jail (1) 122:7 Jamaica (1) 92:19 January (11) 21:19;40:11; 70:25;114:24;115:8; 132:2,7;134:7,13; 155:21,22 Jean (4) 32:7,14;79:2; 81:11 Jesus (1) 21:23 Joblove (3) 7:13;9:10;160:14 John (1) 84:22 join (1) 108:17 joined (1) 146:8 joining (3) 7:16;60:14,21 joint (3) 116:22,25;118:4 jointly (1) 30:12 Jonathan (2) 7:14;9:6 Jose (4) 14:22;15:4,8; 158:4 Joseph (2) 79:1,2 judge (1) 146:15 judgment (1) 41:5 Jufabi (1) 32:9 JUL (1) 125:8	K		
		Kahn (1) 133:21 Kathryn (10) 31:12;39:22; 40:15;50:6,9;51:7; 62:23;63:1;94:4; 121:10 kathryn@igotsimscom (1) 62:23 keen (3) 54:4,9,12 Keep (3) 18:24;60:18;97:22 keeping (1) 95:1 Key (1) 102:3 Keys (1) 54:3 Khan (3) 125:4;129:14; 140:20 kind (2) 82:17;134:11 King (1) 31:15 knew (14) 77:12;85:16,25; 88:2,5,25;89:3; 95:13;103:11; 104:12;118:8;159:3, 7,21 knowing (2) 71:19,20 knowledge (2) 19:22;161:7 known (2) 9:24;27:1 KOROGLU (16) 7:12,12;9:6,9,13; 110:11;112:9;		Lake (15) 15:19,19;17:6,20, 21;38:21,21;39:22; 43:23,24;45:10; 48:11;84:12,12; 91:23 Lantana (1) 15:15 large (3) 54:24;55:14;90:11 Las (1) 120:19 last (20) 29:22;31:1;33:17, 19;52:3;58:21; 72:20;77:25;101:10; 104:22;112:11; 125:13;128:20; 134:6,13;140:23; 144:16;155:20,23; 158:2 late (4) 7:6;105:11;130:1, 7 later (4) 78:1;87:19;113:8; 148:6 law (1) 160:13 laws (3) 64:10,16,20 lawyer (1) 81:12 lead (2) 58:25;148:19 leadership (3) 40:15;58:22;59:2 leased (1) 31:2 least (2) 81:25;115:17 leave (1) 160:18

<p>117:4;149:10;150:9; 154:11 listen (1) 152:4 lists (11) 30:22;31:11,24; 32:5,13,18;60:22; 61:21;77:1;98:2,3 litigation (10) 108:20;109:15; 110:5,19;111:11; 146:24;148:1; 150:19,24;151:4 little (1) 134:22 live (4) 12:14;14:6,9;15:2 lived (5) 13:6,11,21;36:2; 158:7 lives (1) 82:18 living (2) 15:4;121:4 LLC (24) 9:8,9;32:2;37:6, 16;38;18;39:19;43:6, 6,7,8;44:11;45:2; 46:1,7,14;48:1,7; 54:21;82:5;113:24; 153:25;154:15; 155:17 LLC's (1) 43:22 Loan (6) 43:6,17,22;44:11; 48:1,7 local (1) 149:1 location (4) 12:24;13:4,5; 30:15 Lock (1) 14:17 London (1) 12:6 long (2) 104:5;110:3 long-term (4) 56:13,15,19,23 look (14) 42:2;46:20;54:2; 101:18;117:18; 124:13;140:23; 141:19;142:4; 144:16;149:18; 150:3,11,12 looking (15) 36:9,11;60:1; 127:15;130:25; 137:8,17;138:14; 142:21;143:22; 144:7;145:7;150:7;</p>	<p>153:11;154:18 looks (1) 149:16 Loquat (2) 14:13;139:13 L-o-q-u-a-t (1) 14:14 lose (1) 85:4 loss (4) 28:2;59:12,14; 130:4 losses (1) 103:25 lost (7) 28:24;77:18; 91:12;103:17,23,25; 104:19 Louis (4) 9:21;54:20;79:4; 155:4 L-o-u-i-s (1) 9:22 lovers (1) 158:18 lull (2) 68:1;94:25 lunch (1) 151:23 Luxury (3) 31:14;44:19;45:2</p>	<p>103:1 manager (6) 37:5;38:3,6,25; 45:3;46:16 manager/member (1) 38:20 managing (2) 44:13;82:17 manner (1) 66:4 many (8) 66:12;82:25;83:3, 11,11;88:2;89:4; 105:14 March (1) 107:9 margins (2) 59:17,24 Mario (6) 40:4,10,14;49:18; 94:9,15 mark (30) 19:8;20:12;23:14; 27:21;29:13;33:6; 35:13;37:12;38:16; 42:23;43:17;44:23; 45:21;46:9;47:12; 48:5,25;50:4,23; 72:6;73:9;97:12; 116:21;119:5; 124:10;126:13; 133:14;140:13; 152:20,22 marked (38) 19:8,11;20:8; 23:10;27:17;29:9; 33:8;34:3;35:14; 37:8;38:12;39:10; 41:7;42:19;43:19; 45:6,17;47:1,8,22; 48:15;49:22;50:19; 51:13;62:7;73:5; 97:16;114:20; 118:24;126:10; 129:7;133:9,15; 140:16;146:6; 156:12,25;157:12 market (9) 55:2;56:4;57:25; 87:11,15,22;104:1; 108:3,8 Martin (1) 79:4 materials (5) 34:12;60:25;61:3; 63:2;98:1 matter (8) 16:15;19:5,10; 20:12;23:4;27:12; 29:13;46:10 maturity (1) 78:5 maximum (1)</p>	<p>57:21 may (25) 11:16;16:24;30:7, 10,20;31:21,22; 34:15,17;41:25;43:1; 50:1;51:18;60:14; 64:12;65:22;94:1; 97:23;101:4,19; 109:17;115:6;131:6, 12;152:13 Maybe (2) 13:11;124:25 McClashie (1) 79:3 McKeon (1) 123:2 mdfrezin@aolcom (1) 73:11 mean (3) 17:22;149:19,22 means (2) 57:8;74:3 meant (1) 17:24 mechanism (2) 151:22;152:16 medication (1) 12:1 Medor (1) 32:14 meet (1) 83:1 meeting (22) 73:18;76:2;82:4; 84:11,14,18,21;85:3, 10;86:8,25;87:7; 96:12,16,19;107:21, 24;108:14;112:13, 20,24;113:5 member (7) 44:13;46:17; 65:20,22;66:23,24; 68:11 Members (7) 60:15,21;66:12; 78:24;81:9;82:17; 96:1 Member's (1) 68:12 membership (5) 61:4,15;62:14; 68:13;69:15 memory (1) 13:11 mentioned (1) 106:9 message (3) 22:14;62:22; 132:18 messages (1) 27:5 met (6) 91:19,22,25;</p>	<p>105:18;107:6,9 Metellus (16) 88:13,19,25;89:7, 11,14,19;90:1,5,13, 15,20,23;91:1,8,16 Metellus's (2) 88:16;91:13 method (2) 56:15,24 Miami (2) 9:11;15:11 might (1) 16:14 million (7) 28:20,25;119:11; 130:12;136:7,18,21 millionaires (1) 90:12 mine (1) 80:15 minimum (1) 106:6 minus (1) 102:10 minute (1) 9:16 minutes (1) 7:6 Mireille/Magda (1) 79:15 misappropriation (1) 79:12 Mischaracterizes (1) 158:22 misrepresentation (2) 147:22,25 Miss (2) 119:9,25 misspelled (1) 135:15 Misstates (35) 35:5;42:12;52:12, 19;53:2,18,23;54:14; 57:11;68:3;71:6,22; 73:24;75:2;76:16; 81:3,21;83:15,23; 84:7;85:20;86:2; 88:8,21;107:3; 114:16;115:20; 116:11;122:11,20; 123:5,12,19;159:4, 15 mistake (1) 90:5 mistaken (1) 152:13 mistakenly (1) 149:17 modest (1) 59:15 Mohan (1) 107:17 moment (6)</p>
	M			
	<p>ma'am (1) 153:2 Madam (1) 147:14 Magda (9) 72:19;73:11,21; 75:10,16;77:23;80:8, 16;84:14 mailing (4) 35:22;37:19; 38:19;44:6 main (2) 78:2;148:18 maintain (4) 30:14;53:9,14; 104:4 majority (2) 57:4,7 Makers (1) 96:13 making (12) 50:16;53:22;58:3; 59:21;60:8;65:22; 75:17;76:9,12;82:21; 105:8;159:11 Management (12) 39:7,18;43:8; 45:14;46:1,3;58:21; 102:5,11,17,24;</p>			

<p>34:17;48:22; 86:18;124:13; 125:16;138:9 moments (1) 153:7 Monday (8) 72:10;80:10; 131:17;137:3,9; 138:23;141:5;142:5 money (140) 31:6,18;34:19; 35:2,2;41:2;50:17; 51:4;68:1,15;69:5,8; 71:4;74:12;76:13,20; 77:13,17,17;78:11, 25;79:24;80:2;81:1, 13,18;83:20;84:2; 85:24;87:10,15,17, 19,21;89:12;90:16, 18,21;91:13,17; 93:18;94:13;95:1,10, 13,14;96:3;99:4; 102:9,20;103:17,22; 104:16;105:15,24; 106:1,14,25;108:11; 113:4,21;114:13; 116:3,5,8,18;118:4,8, 9,20;119:13,16,17, 19;120:5,11,18; 121:5,14,21;122:8, 14,17,23;123:3,8,22; 124:4;126:1,5;127:8, 10,12,17,17;130:21; 131:3,9,15,20,25; 132:5;133:4;136:9, 12,24;137:14,15,25; 138:7,11,12,21; 139:5,19;140:6,8; 142:1,8,19;143:3,6, 19,20;144:3,5; 145:16,19,22,24; 155:7,10,12;156:9; 157:9,24;158:10,13, 17;159:11 Monia (1) 72:7 monies (3) 76:20;79:20;104:3 Monsanto (1) 84:23 month (10) 57:18,20,22,24; 59:15,15;76:1;89:12, 16,17 monthly (1) 57:19 months (4) 57:19;90:18; 105:24;108:12 more (13) 14:8;28:19,25; 67:22;78:7;94:23; 95:3,5;96:24;124:14, 18;133:24;141:12 morning (12) 7:4,7,22,23;8:3; 9:4,5,12,13;10:6; 12:3;19:15 MOS (1) 125:8 most (2) 59:13;87:25 move (2) 25:2;111:15 moved (1) 14:11 Mrs (8) 129:19,24;130:10; 131:7,13,18,23; 132:3 much (10) 78:6;79:18;80:2; 87:8;120:7;124:14, 18;130:13;160:5,9 multiple (2) 77:10;78:24 must (2) 100:25;101:12 Mutual (12) 119:10;130:11,17; 131:2,8,14,19,24; 132:4;136:6;139:25; 141:23 myself (1) 8:22 Myway (1) 129:11</p>	<p>N</p> <p>name (20) 9:20;29:18;33:18; 35:17;36:19;37:20; 39:21;40:8;47:18,19, 19;50:15,25;68:17; 114:25;115:3; 135:16;154:10,20,24 named (7) 50:1;86:17,22; 88:12;91:20;105:19; 107:6 names (2) 9:24;43:9 Nazaire (2) 79:3,4 Ned (1) 132:22 need (14) 11:9,12,23;48:22; 81:11;86:18;109:15, 24;110:5,19;122:6; 125:16;138:9;160:10 needed (3) 94:22;96:23;128:5 nefarious (1) 111:18</p>	<p>neither (4) 91:15;110:11; 148:21,25 Neptime (1) 42:25 net (2) 28:2;98:24 New (13) 12:6;51:25;60:14, 21;61:9;66:23; 95:25;96:3,9;99:4; 105:20;107:10; 116:22 News (2) 101:19;103:14 newsletter (4) 100:3,5,11,21 newsletters (1) 100:18 next (34) 53:6;54:18;58:9; 61:19;65:1;66:19; 67:18;68:7;69:15,18, 19;75:9;76:22;77:8, 20;79:14;80:7;81:6; 82:3,11;89:15;99:7; 100:6;112:22; 117:18;119:23; 126:23;127:1,2; 128:8;135:19; 136:14;137:2,8 Nivose (5) 125:10,16;126:1; 137:20,22 nobody (2) 64:2;65:13 nod (1) 10:16 Nor (5) 71:16;89:23; 91:15;110:12;148:21 North (1) 31:25 notarized (2) 29:22;115:13 note (8) 7:3;59:14;114:23; 115:1,17,17,23; 121:20 noted (1) 146:24 notice (11) 19:9,16,18;109:19; 111:6;125:8;146:18; 149:19;150:4,13,14 noticed (3) 118:20;146:18; 148:23 November (5) 100:7;105:5; 155:23,24;159:10 Number (48) 14:21;18:13,17,21; 20:14;22:7,14,15,23, 25;24:13,21;31:11; 32:1;35:9;41:20,21; 56:11;61:21;63:23; 64:7;68:18;72:7,19; 73:14;75:6;81:9; 84:17;90:12;98:3; 107:16;114:21; 117:13,14,16;125:9; 129:20;135:14,24; 137:5,11;138:17; 147:6,13,15;150:12; 152:23;154:8 numbers (2) 20:1;60:4 Numerous (1) 66:9</p>	<p>officer (4) 49:9,19;51:9; 65:21 officers (4) 65:9,14;74:22,22 Officers' (1) 65:2 offices (3) 74:12;84:11;91:23 official (1) 129:3 Okeechobee (1) 76:2 one (31) 11:10;13:17; 21:11;27:6;33:6,24; 36:8,9,24;49:19; 54:12;60:22;64:22, 22;80:4;81:9;83:19; 91:7;99:14;102:22; 104:5;106:21; 113:23;115:8; 125:22;133:19,20; 144:10;153:5; 160:20;161:16 one-page (2) 21:16;36:15 only (6) 59:15;74:22; 80:16;87:18;106:5; 152:18 open (4) 128:5;132:9,10; 157:24 opened (18) 116:17;118:5; 122:10,13;125:25; 126:20;127:7;128:2, 13,15,18;130:6; 132:17;138:20; 139:1,4,16;157:21 opening (9) 61:4;62:15;69:18; 126:25;128:10,24; 139:15;146:4;153:23 operate (1) 63:6 operating (2) 62:12;63:12 operations (1) 72:14 opportunities (2) 59:16;92:22 opportunity (1) 161:2 opt (1) 104:5 option (1) 132:24 optionsXpress (21) 32:5;116:17,21; 118:19;119:8; 122:13;126:25;</p>
O			
<p>oath (4) 10:8;23:21,22; 24:20 object (5) 11:17;110:2,3; 111:20,22 objection (44) 11:18;16:11; 34:13;35:5;42:12; 52:12,19;53:2,17,23; 54:14;57:11;68:3; 71:6,22;73:24;75:2, 21;76:16;78:13;81:2, 21;83:15,23;84:7; 85:20;86:2;88:8,21; 107:3;114:16; 115:20;116:11; 118:23;120:16,21; 122:20;123:5,12,19; 128:14;158:21; 159:4,14 objections (1) 149:3 objective (1) 53:8 Objectives (1) 53:7 obstruct (2) 147:1;150:25 October (3) 35:19;70:23; 141:20 off (20) 7:18,19;27:5,8; 109:15,25;110:5,20, 22,23,24;111:13; 112:1;123:23,24; 128:1;135:8;141:15; 145:4;151:6 office (8) 15:24,25;17:22; 39:3;44:3;47:20; 48:13;96:13</p>	<p>officer (4) 49:9,19;51:9; 65:21 officers (4) 65:9,14;74:22,22 Officers' (1) 65:2 offices (3) 74:12;84:11;91:23 official (1) 129:3 Okeechobee (1) 76:2 one (31) 11:10;13:17; 21:11;27:6;33:6,24; 36:8,9,24;49:19; 54:12;60:22;64:22, 22;80:4;81:9;83:19; 91:7;99:14;102:22; 104:5;106:21; 113:23;115:8; 125:22;133:19,20; 144:10;153:5; 160:20;161:16 one-page (2) 21:16;36:15 only (6) 59:15;74:22; 80:16;87:18;106:5; 152:18 open (4) 128:5;132:9,10; 157:24 opened (18) 116:17;118:5; 122:10,13;125:25; 126:20;127:7;128:2, 13,15,18;130:6; 132:17;138:20; 139:1,4,16;157:21 opening (9) 61:4;62:15;69:18; 126:25;128:10,24; 139:15;146:4;153:23 operate (1) 63:6 operating (2) 62:12;63:12 operations (1) 72:14 opportunities (2) 59:16;92:22 opportunity (1) 161:2 opt (1) 104:5 option (1) 132:24 optionsXpress (21) 32:5;116:17,21; 118:19;119:8; 122:13;126:25;</p>		

<p>128:10,24;132:9; 133:24;134:2;135:1; 139:15;140:9; 141:12;145:1;155:8; 156:3,18;157:22</p> <p>orally (1) 70:18</p> <p>orchestrated (1) 152:22</p> <p>order (4) 42:4;134:6,23; 141:4</p> <p>organization (17) 26:1;37:15;39:1,7; 45:1,13,24;46:12,17; 47:4;48:8;49:9;50:1, 5,12;51:3,10</p> <p>organizations (2) 31:11,17</p> <p>Orlando (1) 92:15</p> <p>others (6) 17:14;52:10;87:7; 113:3,16;123:9</p> <p>out (18) 14:11;19:5;41:22; 63:6;84:17;95:25; 96:9;99:4;100:17; 102:9;121:17;122:7; 134:24;146:1; 151:21;152:16; 153:14,17</p> <p>over (23) 10:4;15:6;30:13; 31:5;32:6,22;40:15; 42:16;44:15,18; 45:13;46:5;47:4,25; 48:18;54:22;55:1; 56:2;61:12;65:8; 94:9;124:13;156:22</p> <p>overall (1) 59:17</p> <p>own (7) 86:7;95:21; 118:15;119:20; 152:10,10;158:13</p> <p>owner (1) 36:4</p> <p>owners (2) 56:14,20</p> <p>Ownership (1) 54:19</p> <p>OX (1) 125:8</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>package (1) 67:19</p> <p>Packet (4) 60:22;66:23;98:1; 129:14</p> <p>page (79)</p>	<p>24:3,8;29:18,19; 30:24;31:9;33:17,19; 34:22;36:24;40:7; 41:12;44:11,12; 46:20;49:8;51:19; 53:6;54:19;58:10; 59:6;60:2;61:1,19; 63:11;64:6,7;65:1, 17;66:19,20;68:7; 69:18,19;74:20,21; 75:9;76:22;77:8,20; 79:14;80:7;81:6; 82:3;97:25;98:15; 99:7;100:6;103:14; 117:18;119:4,23; 125:5,13,23;126:14, 19,23;127:14;128:1, 8,21;129:18;133:13; 134:6,9;135:19; 136:14;140:23; 141:5;144:16; 153:24;154:5,18,23; 155:2,20;156:16; 157:4</p> <p>pages (18) 36:17;56:9;57:14; 58:20;59:11;60:15; 64:5;67:8,20;69:14; 70:2;97:21,22;98:16; 119:4;127:4;130:9; 158:2</p> <p>paid (3) 41:1;87:18;120:24</p> <p>Palm (1) 88:16</p> <p>paper (1) 153:7</p> <p>paragraph (26) 28:1,1,6,6,11,11, 17,18;29:2,23;30:8, 9;31:25;46:21;52:3; 57:16;58:22;59:13; 60:1;68:8;78:1; 98:20;100:23; 101:11;104:22; 128:23</p> <p>paragraphs (1) 28:5</p> <p>Pardon (7) 97:22;101:4; 108:16;112:16; 124:21;144:18;150:2</p> <p>parens (1) 31:12</p> <p>Park (1) 45:10</p> <p>Parker (21) 31:13;39:22;40:4, 16;50:6,9;51:7,9; 52:9;62:24;63:1; 94:4,6;107:20; 121:10,13,20,24; 122:6,14;123:16</p>	<p>Parkway (1) 14:18</p> <p>part (9) 61:8,11,14;63:16; 65:7;66:21,22;152:6, 7</p> <p>participate (3) 146:16;149:2,23</p> <p>participated (2) 96:16;109:12</p> <p>participating (2) 8:16;109:8</p> <p>particular (2) 87:3;90:2</p> <p>particularly (1) 11:24</p> <p>parties (1) 151:4</p> <p>partners (2) 56:14,20</p> <p>partnership (5) 61:5,5;62:13; 64:11;67:9</p> <p>party (20) 42:3;61:20;62:1; 108:20;109:14; 110:4,12,19;111:11; 146:18,24;147:25; 148:21;150:9,19,21, 23,23;151:8;161:18</p> <p>Pasby (17) 38:6,9;115:7,16, 23;116:8,14,18; 117:1;118:5,18; 119:6,9,19;120:1,5, 18</p> <p>Pasby's (1) 117:21</p> <p>Past (4) 70:3,5;71:14; 101:21</p> <p>Patrick (42) 32:14;108:18,18; 109:7,9,16,17,22; 110:1,18,21,23,24; 111:3,10,13;112:2,4; 146:9,9,11,14,22; 147:4,12,16,19; 148:2,7;149:5,7,13; 150:2,11,16,20,24; 151:9;152:4,23; 153:1,12</p> <p>Patrick's (1) 148:20</p> <p>PAULOSE (167) 7:2,10,15,20,24,25, 25;8:12,20;9:3,12, 14;16:2,10,16,19; 17:4,10;18:4,11,16; 19:1,13;20:10,19; 21:13,15;22:21;23:6, 12;24:18,25;25:3,8, 13,18;27:19;29:11;</p>	<p>33:10,22;34:5,14; 35:7,16;36:11,14,16, 25;37:3,10;38:14; 39:12;41:9;42:15,21; 43:21;45:8,19;47:3, 10,24;48:17;49:24; 50:21;52:15,22;53:5, 20;54:1,17;57:13; 68:6;71:9,25;73:7; 74:1;75:4,22;76:18; 78:16;81:5,23;83:18, 25;84:9;85:22;86:5; 88:11,24;97:18; 107:5;108:16,19,23; 109:1,6,10,10,21; 110:3,14,18,22; 111:2,8,21;112:4,7, 10,15;114:18; 115:22;116:13; 119:1;120:17,23; 121:3,8;122:12,22; 123:7,14,21;124:3,8, 16,21,24;125:2; 126:12;128:17; 129:9;133:11,17; 140:18;146:8,11,22; 147:9,16,24;148:4, 12,15;150:22; 151:11,16,20,24; 152:14,21;153:9,13, 21;156:14;157:2,14; 158:23;159:6,17; 160:2,6,17,21; 161:13,17,20</p> <p>Paulose's (1) 150:4</p> <p>pay (2) 34:19,25</p> <p>paychecks (1) 94:12</p> <p>pending (3) 11:14;126:20; 128:3</p> <p>penny (3) 83:19;97:8;113:14</p> <p>penthouse (1) 107:13</p> <p>penultimate (1) 98:20</p> <p>people (21) 20:14;25:19;57:5, 7,8;59:6,8;72:7,19, 23;73:14;78:10; 80:2;88:5;90:12; 95:12;100:14; 107:17;149:21; 151:3;159:21</p> <p>people's (4) 71:4;76:13;82:18; 102:20</p> <p>per (3) 57:20;98:20;99:4</p> <p>perceived (1)</p>	<p>65:20</p> <p>percent (12) 28:24;53:10,16; 57:18,20,21;80:17; 102:5,11,16,23; 103:6</p> <p>perform (1) 65:10</p> <p>Performance (3) 70:3,5;71:14</p> <p>Perlman (2) 7:14;9:7</p> <p>person (4) 46:19;49:12; 149:9;154:11</p> <p>personal (7) 65:21;76:19; 82:17,18;116:9; 123:1;158:14</p> <p>personally (16) 66:16;70:12; 72:16;76:8,12;82:25; 83:3,10;91:8,19,22; 95:18;100:10,13; 106:17;114:5</p> <p>person's (2) 154:6,19</p> <p>Phadine (1) 79:3</p> <p>phone (10) 8:24;11:25;18:13, 17,20;19:2;20:1; 61:21;84:17;98:3</p> <p>phrases (1) 27:2</p> <p>PI (1) 97:15</p> <p>Pickett (5) 21:19;22:1,1,4,14</p> <p>Pickett's (1) 22:11</p> <p>pictorial (1) 70:17</p> <p>Pierre (1) 32:7</p> <p>placate (1) 95:24</p> <p>Place (5) 12:6,20;13:19; 149:15;158:7</p> <p>placed (3) 21:4;60:25;81:10</p> <p>placing (24) 20:11;23:13; 35:11;37:11;38:15; 39:13;41:10;43:15; 44:22;45:20;46:9; 47:11;48:4,24;50:4, 22;51:12;62:6;72:5; 73:8;114:19;116:20; 119:2;124:9</p> <p>plaintiff (2) 150:10;152:5</p>
---	--	---	---	---

Plan (7) 51:15;52:17; 102:3,8,14,22;104:7	34:12	Profit (5) 59:12,14,17,24; 84:6	put (4) 26:20,23;63:1; 93:11	119:11;120:3; 124:11;126:21; 128:1;129:22;
playing (2) 108:3,7	prepare (1) 52:9	profiting (1) 87:22	puts (1) 132:25	130:12,19;132:13; 135:16,25;136:7,19; 137:11;138:18;
pleasant (1) 112:2	prepared (1) 121:20	Projected (2) 59:12;60:1	putting (5) 27:20;29:12;34:6; 66:1;75:12	139:1,25;141:6,23; 143:1,12,25;145:14
please (24) 7:11;8:4,25;9:16, 19:10;22;11:10; 12:5;22:22;25:4,9; 54:18;56:6;57:14; 58:9;63:10;64:5; 65:17;97:21;101:9; 112:11;119:23; 132:22;141:17	present (5) 86:25;107:20; 108:21;109:2;146:17	projection (1) 59:21	Q	reading (2) 24:11;57:16
plus (6) 97:2;102:5,15,15, 16,23	presentation (4) 76:3;112:25; 114:5,8	projections (2) 57:24;59:14	qualified (1) 58:24	reads (8) 43:3;52:4;59:13; 60:3,14,20;65:19; 68:8
pm (17) 21:19;62:10; 77:23;125:14;131:6, 18,23;136:3,15; 137:9;138:5,24; 139:22;144:18,19, 23;161:24	presentations (2) 62:17;76:9	projects (1) 92:18	quarter (3) 71:4;85:12;106:2	ready (1) 9:15
point (7) 40:14;56:11;74:6, 15;109:13,25;152:11	presenting (2) 127:21,25	promise (4) 103:8,10;113:7,10	quickly (4) 60:5,11;160:18,20	real (2) 65:20;106:2
Political (3) 128:22;129:1,2	president (10) 44:7,10;46:19; 48:8;54:20;55:6; 65:3,4;73:17;98:3	promised (4) 74:8;79:1,93:17; 114:9	quite (2) 75:14;81:25	really (3) 81:11;147:4,22
portrayal (1) 61:24	presidents (3) 69:4;74:13;91:7	promises (9) 50:16;52:24;64:3; 70:11,14;76:13; 82:22;105:8;159:12	quote (1) 7:7	reason (4) 20:2;78:2;152:3; 153:6
portrayed (1) 40:19	pressure (2) 88:19;90:8	promising (4) 70:8;102:8,19; 103:5	R	recall (7) 20:4;23:14;30:15; 33:3;86:17;121:11; 160:24
portraying (1) 42:7	presume (2) 19:21;152:11	promissory (1) 121:20	Rachel (6) 7:10,25;21:8;36:7; 109:10;124:15	receipt (3) 61:16;62:15;69:19
position (2) 24:25;148:15	previous (1) 100:17	Proof (1) 100:22	raise (3) 8:4;113:21;149:3	receive (2) 61:17;81:13
positions (2) 26:13,15	previously (10) 23:3;24:19;35:8; 36:2;51:13;62:7; 97:15;117:15;121:9; 146:25	properties (1) 30:11	raised (4) 28:19;97:1; 158:25;159:11	received (27) 7:4;72:16;109:19; 111:6;119:9;120:2; 130:10,16;131:1,7, 13,19,23;132:3; 136:6,17;138:5; 139:24;141:22; 142:8,15,25;143:11, 15,25;144:13;145:13
possibly (1) 104:13	principal (4) 37:19;38:18; 43:22;44:5	property (4) 30:16;68:14;69:4, 7	range (1) 14:12	Receiver (7) 7:14;9:7;23:16; 110:8;148:12;149:9; 153:4
potential (3) 52:5;65:20;110:16	printed (1) 134:24	proprietor (2) 55:1,25	rate (5) 53:10,15;57:18,21; 70:22	Receiver's (4) 23:4;112:7; 147:10;152:12
Powerofone (1) 32:9	printout (2) 41:12,16	prosperous (2) 75:12,18	rates (1) 57:24	recent (1) 108:7
powerofone@mywaycom (5) 21:2;129:15; 131:6,12;132:22	prior (3) 13:19;22:2;147:2	protect (1) 42:4	Re (4) 21:23,23;43:2; 128:22	recently (3) 126:20;128:2,24
prediction (1) 60:8	private (3) 28:7;113:24;114:9	proven (1) 58:22	reach (2) 16:8;78:4	recess (1) 153:20
predictions (1) 58:4	Probably (5) 15:3;60:15;67:20; 70:1;97:15	provide (1) 161:6	reaching (1) 57:21	Recession (1) 100:22
predictor (1) 71:16	problem (1) 112:19	provided (4) 22:6,7;111:7,8	read (79) 22:16,18;24:15; 28:2,8,14,20;30:17, 20;32:2,10,15,19; 35:19;40:12;42:5; 43:24;51:16,25;52:6; 53:11;54:5;55:3; 56:17;58:1,11,13; 59:18;60:5;61:21; 63:12;64:13;65:24; 66:24;68:20;69:16; 70:6;75:14;76:6; 77:1;78:8;79:21; 80:18;81:13;98:25; 101:2,8,13,22;102:6, 24;103:18;104:7,24; 115:11;117:5;	recipients (1) 72:21
preliminary (1) 19:5	problems (3) 75:17;82:8,8	providing (1) 51:24		recognize (13) 15:12,16,20;18:12, 17,20;19:2;27:22; 41:13;43:8;45:9; 50:25;114:25
preparation (1)	Procedure (1) 148:25	provisions (1) 16:24		recognizes (1)
	procedures (2) 62:12;63:12	public (2) 108:25;109:1		
	proceed (1) 11:8	purported (1) 67:22		
	process (2) 26:9;128:25	purpose (9) 66:1;67:25;68:18; 114:14;118:13; 119:21;126:8; 146:25;158:24		
	processing (5) 120:2;142:16; 143:1,12;145:13	purposes (1) 16:7		
	professional (1) 25:10	pursuant (2) 17:1;19:15		

52:4 record (25) 7:2,18,19;8:21; 10:18,19;11:17; 21:17;22:23;25:1; 35:12;37:13;38:17; 39:15;43:16;44:25; 45:23;46:11;47:13; 48:6;49:1,7;50:24; 110:25;111:1 Records (3) 34:7,10;141:12 recruit (4) 61:9;105:7,12; 113:17 recycled (1) 96:3 refer (1) 18:7 reference (2) 50:16;74:23 referrals (2) 56:16,24 referring (3) 21:12;127:17; 134:19 refers (1) 80:20 refused (3) 92:6;95:9,12 refusing (1) 96:20 regarding (5) 30:20;33:1;41:17; 78:3;80:17 Reginald (1) 79:1 registered (8) 37:20;38:20,25; 39:21;40:9;47:17,18; 49:12 registration (1) 36:19 regular (1) 72:25 regularly (1) 74:11 regulate (1) 65:9 regulating (1) 64:10 regulations (2) 64:16,20 regulatory (3) 28:13;40:20,24 related (4) 46:6;47:5;48:1,18 relationship-oriented (1) 56:12 relationships (2) 56:13,20 relative (4) 40:4;94:10;	126:16;129:2 relatives (2) 26:18;49:19 remains (1) 64:9 re-mark (1) 114:21 remember (3) 86:22;88:12; 114:21 remind (1) 10:18 repeated (2) 70:14;113:7 repeatedly (1) 114:13 rephrase (1) 11:3 reporter (7) 8:5,21,23;9:20; 10:11;112:12;147:14 represent (2) 150:18;161:17 representation (3) 62:3;93:7;129:4 representations (1) 86:14 represented (2) 8:13;20:3 representing (1) 153:4 Request (14) 33:12,17;62:17; 81:10;98:23;106:18; 120:1;142:7,14,16, 24;143:11,25;145:12 requesting (1) 79:17 requests (3) 33:25;94:23;96:21 required (2) 11:19;29:5 Research (1) 32:19 resent (1) 111:4 responded (2) 22:13;111:6 response (4) 10:13;22:11;33:5, 24 Responses (1) 33:12 rest (2) 103:16;104:23 restoration (1) 76:4 resulting (1) 98:24 return (4) 52:6;70:5;103:6; 106:19 returned (1)	106:21 returns (2) 71:17;74:8 Reverse (9) 43:6,17,22;44:11; 48:1,7;134:5,23; 141:4 review (1) 161:2 Rhetoric (1) 43:6 right (27) 7:3;8:5;15:10; 16:16;22:15;37:2; 60:24;80:5;101:6; 108:20;109:2; 112:10;116:8; 119:13;124:24; 130:14;132:25; 146:12,23;148:8; 149:22;150:8;151:2, 5,7;152:15;153:4 rights (5) 16:21;17:1,11,13, 14 risk (3) 52:5;89:12;90:21 risks (2) 89:20;106:9 Road (11) 13:15,20;15:15,19; 17:6,20;38:21;39:22; 43:23;48:12;84:12 Robert (1) 80:15 Roger (1) 72:20 Ronald (1) 81:11 room (2) 7:21;8:22 Roosevelt (2) 105:19;107:10 Roswell (1) 14:18 rule (2) 80:17,21 rules (9) 10:4;62:14;67:21; 68:11;80:2,21,24; 148:25;149:1 rumors (2) 79:10,18 run (1) 51:6 running (1) 7:6 Russ (2) 9:1,4 Russell (1) 34:8	S Saborese (3) 86:23,25;87:3 Saborese's (1) 87:10 safe (1) 68:2 safety (1) 93:15 sales (4) 54:23,25;55:11,20 salon (1) 88:16 same (12) 13:17;18:22;20:5; 44:2;48:12;86:8; 105:8;112:18; 148:17;150:17,23; 161:17 San (4) 14:22;15:4,8; 158:4 Saturday (1) 112:21 Saving (2) 27:6;99:14 saw (1) 119:19 saying (5) 7:5;27:5,8;73:10; 147:6 Schmidt (1) 62:9 script (2) 61:8;62:16 SEC (7) 7:10;21:23;64:10; 109:11;111:10,12; 148:20 second (21) 28:12;29:18,19; 31:9;40:7;46:20; 57:16;60:2;63:11; 64:7;65:5;76:24; 80:14;81:7;89:17; 100:24;125:5; 126:19;129:18; 134:9;141:5 seconds (1) 160:11 secretary (2) 65:4,5 SEC's (4) 19:16;33:12; 109:23;147:9 section (3) 41:25;54:2;59:12 secure (2) 103:17,22 Securities (2) 8:1;32:25	Security (8) 22:23,25;24:13,21; 117:13,14,16;154:8 seed (1) 121:13 seeding (1) 51:24 self-dealing (1) 68:19 send (1) 110:21 sending (2) 78:2;111:15 Senior (3) 128:22;129:1,2 sent (11) 21:18;22:4;36:8; 43:1;77:22;99:17; 100:2,17;149:9,20; 153:6 sentence (10) 28:12;51:21;52:3; 58:21;60:3;81:8; 100:24;101:8,10; 104:22 sentences (1) 77:25 separate (1) 111:15 September (5) 62:9;82:5;106:18; 142:5,11 Seraphin (1) 79:2 series (6) 73:20;82:11;99:8; 119:2;126:15;157:16 served (2) 54:23;55:14 service (2) 149:11,17 Services (7) 39:8,19;41:25; 56:16;68:14;69:4,7 set (15) 30:9;36:20;39:25; 40:18;43:12;50:6,12; 67:1,22;68:23;80:21, 24;94:1,3;123:15 setting (2) 67:11;80:2 seven (4) 60:23;70:2;91:25; 151:13 several (4) 54:24;55:14;86:6; 106:18 shall (6) 64:8;66:21,22; 68:9,11;101:8 share (1) 141:18 shared (1)
---	--	--	---	--

118:9 Sheila (6) 12:9,14;35:22; 37:21;79:4;117:4 Shields (1) 72:7 show (2) 10:17;130:24 showing (1) 37:1 Shuja (4) 125:4;129:14; 133:21;140:20 side (4) 60:24,24,24;102:2 Sierra (2) 92:18;93:2 sign (5) 27:4,8;37:6,16; 43:6 signature (15) 29:18;33:19; 99:13;114:25;115:3; 117:19,20,20,21; 118:1;126:21;128:3; 154:10,20,24 signed (4) 36:18;66:23; 132:18;153:5 significant (4) 54:25;55:20;59:9; 75:17 signs (1) 7:9 similar (1) 57:23 simply (3) 16:24;26:17;116:9 SIMS (13) 28:7,13;39:25; 40:15,18,23;41:1,16; 42:7;50:6;94:9,9,12 Singh (1) 107:18 single (7) 33:24;87:14; 111:23,25;113:13; 125:22;133:19 sister (3) 49:15;96:12; 122:16 situated (1) 30:14 situation (3) 81:24;82:13,14 six (4) 56:9;57:19;60:23; 70:2 Sky (1) 31:15 slide (2) 60:14,20 slightly (1)	57:23 slogans (1) 27:2 small (2) 56:13,20 Smart (2) 39:7,18 Snellville (1) 12:6 Social (8) 22:23,25;24:12,21; 117:13,14,15;154:8 socioeconomic (1) 87:24 sole (3) 54:25;55:24; 146:25 solely (1) 150:25 somebody (1) 108:17 somehow (1) 111:17 someone (1) 153:10 somewhere (1) 122:8 sophisticated (1) 88:3 sorry (14) 13:2;36:7;42:23; 47:18;73:16;83:10; 119:3;124:10;125:5; 127:18;130:4,14; 134:17;149:7 sort (2) 80:3,4 sought (1) 33:1 sound (2) 75:11,18 Southern (1) 149:1 speak (3) 10:12;83:4;159:18 speaking (1) 149:8 specializing (1) 51:23 specifically (2) 14:8;25:15 specifics (1) 92:6 speculation (8) 78:14;118:23; 120:22;121:2,7; 123:20;124:2,7 spell (1) 9:20 spend (1) 133:1 spite (2) 60:3;103:16	spoke (2) 83:6,10 staff (1) 74:15 stand (2) 146:15;147:20 standardize (2) 63:20;69:23 standardized (1) 67:15 standards (1) 67:23 Stanwood (3) 14:21;15:9;158:4 start (3) 10:23;24:10; 121:14 started (2) 17:7;112:21 starting (1) 17:12 starts (1) 152:12 startup (2) 51:24;121:10 state (24) 9:19;12:5;16:14, 24,25;22:23;35:12; 36:17;37:13;38:17; 39:14;43:16;44:24; 45:23;46:11;47:13; 48:6;49:1,7;50:24; 64:10;100:24; 101:11;148:16 stated (2) 85:3,10 statement (25) 29:21;30:9;34:23; 53:22;55:9,13,19; 80:1;85:1,8,14,16,17, 25;86:11;92:12; 93:5;101:15,25; 103:20;104:9,13; 105:2;155:22,23 statements (8) 52:25;58:7;63:23; 124:17;125:21; 155:16,17,21 States (4) 8:1;16:13,22,23 stating (1) 30:15 status (1) 68:13 stay (1) 7:16 steal (2) 69:4,7 steamrolled (1) 147:21 still (8) 75:18;76:8,12; 105:7;112:8;126:20;	128:3;148:12 stipulate (1) 16:20 stock (8) 55:2;56:3;87:11, 15,22;104:1;108:3,7 stocks (1) 106:2 stole (1) 91:12 stolen (2) 77:17;107:1 Stormy (1) 103:15 Strategy (4) 56:10;89:20;92:4; 106:10 street (1) 40:9 strenuously (3) 110:1;111:19,21 Strong (3) 100:22;104:23; 105:4 stuck (1) 132:24 Suarez (1) 21:23 subject (5) 21:23;30:8;43:2; 72:9;125:8 submitted (5) 120:2;142:15,25; 143:12;145:13 subsequent (2) 53:10,15 substance (1) 12:2 substantive (1) 16:5 substitution (1) 150:5 subtract (1) 98:23 Success (2) 54:3;108:7 successful (4) 25:24;58:24; 101:1,12 successfully (1) 56:19 sufficient (1) 68:12 suggest (5) 128:5,12;151:6; 152:2,5 suggested (1) 96:7 Suite (4) 43:23;45:10; 107:13,16 Summary (3) 51:20;56:11;58:21	summer (1) 81:25 Sunday (3) 112:22,24;113:5 supervise (1) 72:25 supervised (1) 72:24 support (1) 51:24 suppose (1) 74:2 supposed (4) 8:18;15:17;72:24; 80:15 sure (4) 14:10;36:20; 134:12;150:20 suspend (2) 68:12;153:15 sustainable (2) 56:15,23 Swaziland (1) 92:19 swift (1) 57:19 swore (1) 30:1 sworn (6) 8:5,9;23:18;24:5, 9,29;21 system (3) 42:4,8,11
T				
				tables (1) 58:10 talk (2) 59:1;78:1 talked (1) 76:3 talking (5) 12:24;109:9,12; 127:11,14 Tamarac (2) 14:14;139:14 Tanisha (1) 115:13 taught (1) 94:3 Tax (1) 68:17 Telasco (27) 91:20,22;92:3,14, 17,21;93:1,11,14,20, 24;94:3,22;95:14,17, 24;96:4,7;97:14; 98:1,12,19;99:3,20, 24;100:2,14 telasco@comcastnet (2) 99:17,20 Telasco's (2)

<p>93:17;97:5 telephone (3) 8:17;22:7;113:8 telling (1) 70:19 template (2) 63:15;67:10 ten (2) 60:15;125:1 Terma (1) 72:20 terminate (1) 68:12 testified (2) 8:9;24:19 testify (1) 12:3 testifying (1) 19:15 testimony (8) 10:12;23:18;24:6, 9,20;159:24;161:5,6 thanks (1) 7:15 Theft (1) 68:14 Theisha (1) 79:3 Theodule (539) 7:6,20,22;8:4,7,13, 23;9:2,15,19,21,23; 11:9;12:1,8;14:4; 15:18,23;16:3,20; 17:5,12,20;18:8,12, 20;19:2,7,19;20:2, 11,13,14,15,20; 21:17;22:2,12,17,22; 23:1,3,16,19,23;24:1, 4,5,15,22;25:4,9,15; 26:2,4,7,10,13,20,24; 27:1,11,22,25;28:1,7, 8,11,18,19,21,24; 29:3,5,17,24;30:2,5, 7,17,22;31:7,15,19; 32:3,10,11,15,16,20, 23,25;33:14,17,18; 34:1,6,12,15,18;35:3, 8,24;36:2,5;37:4,17, 23;38:1,4,7,10,15,22, 24;39:1,8;40:1,4,5, 10,14,16,21,24;41:2, 5,14,18,22;42:8,11, 17;43:5,9,12,25; 44:3,8,13,16,20;45:4, 9,14;46:2,3,5,7,14, 21,24;47:6,15;48:2, 9,22;49:4,10,13,16, 18,20;50:2,5,7,10,13, 17;51:1,4,7,10,16,18; 52:1,6,11,16;53:1,11, 13,22;54:13,20,21; 55:1,4,9,13,25;56:2, 17,21;57:9;58:7,16;</p>	<p>59:18,20;61:12,17; 62:1,4;63:3,8,17,21, 25;64:3,24;65:5,11, 15;66:7,10,14,17; 67:10,16,23;68:2; 70:9,20;71:5,17,21; 72:14,17,21,25;73:3, 8,12,22;74:4,17,25; 75:7,19,24;76:10; 77:6,10,14,18;78:8, 17;79:5,8,12,24; 80:5,22;81:1,19; 82:1,9,23;83:11,14, 21;84:3,6,10,15,19, 24;85:6,8,12,14,18; 86:1,9,11,15,18,23; 87:1,5,8,12,15,19,22, 24;88:3,7,17,20; 89:9,12,17;90:6,13; 91:2,5,10,13;92:12; 93:5,9;94:9,15,19; 95:6,15,19;96:1,21; 97:6,10;98:6,9,13, 23;99:5,10,11,14,15, 18,21,25;100:3,8,11, 14,19;101:2,25; 102:2,12,17,20; 103:3,6,8,11,18,20, 23;104:1,7,10,14,17, 20;105:2,5,9,12,14, 20,24;106:3,7,11,15, 19,22;107:1,7,11,14, 21,25;108:4;109:24; 112:17,20;114:12, 23,24;115:4,7; 116:15,18,23;117:1, 8,11,16,21;118:2,6, 10,13,21;119:6,14, 17,21;120:3,25; 121:5,9,15,18,22; 122:1,14,18,24; 123:3,10,17,25; 124:5,9,12;125:10, 11,16,19,23;126:2,5, 8,17;127:2,3,5,8; 128:6,22;129:5,19, 21,21,24;130:2,10, 22;131:1,7,13,18,23; 132:3,8,19;133:2,5, 22,25;134:3,10; 135:3,6,13,15,23,24; 136:4,10,17,21,25; 137:2,6,10,12,15,22; 138:1,7,9,12,14; 139:8,13,17,24; 140:4,6,10;141:13, 22;142:2,7,9,14,24; 143:4,10,16,24; 144:3,11,14,20,24; 145:2,11,17;146:16; 147:5,7;151:13; 152:7;153:22;154:3, 16,21,25;155:4,5,8,</p>	<p>10,15,18,25;156:4,7, 10,15,19,23;157:7, 10,16,19,22,25; 158:4,8,10,14,19; 159:1,8,13,18,22; 160:3,17,24;161:14 T-h-e-o-d-u-l-e (1) 9:22 Theodules (1) 43:3 Theodule's (7) 7:5;29:14;30:23; 31:1;33:12;80:17,20 therefore (1) 41:4 Theresa (3) 9:10;160:13,17 thinking (1) 68:1 Third (7) 42:3;51:19;61:20; 62:1;81:8;100:23; 125:5 third-party (2) 42:8,10 Thirty (1) 160:11 though (3) 77:12;95:13; 153:19 thousand (3) 87:4;115:8,9 threatened (1) 81:12 threatening (1) 81:16 threats (3) 82:16,18,21 three (12) 36:16;57:14; 58:20;59:11;60:22; 67:8;69:14;77:25; 90:18;105:24; 108:11;119:3 Thursday (8) 98:22;125:14; 131:11;132:7,21; 134:7;140:24;142:21 ties (1) 93:8 timed (1) 62:10 times (2) 92:1;106:18 title (8) 44:10;70:4; 100:21;129:11; 133:13;140:13; 156:16;157:4 titled (1) 125:3 today (1) 81:11</p>	<p>together (3) 26:20,23;63:1 told (40) 24:20;78:18,22; 88:5;89:7,11,14,19; 90:5,11,15,17;92:3,9, 14,17,21;93:1,11,14, 20;94:21;95:24;96:8, 23;97:1;105:22; 106:1,5;108:2,6,10; 113:3;117:15; 120:10,13;121:24; 122:3,6;146:13 toll (1) 41:20 tomorrow (1) 81:13 took (6) 11:10;75:13;99:3; 120:5;158:10,16 top (4) 30:23;34:22; 46:20;102:2 total (4) 53:9,15;91:25; 123:2 touch (2) 153:15,18 Toussaint (1) 91:8 towards (2) 151:13;153:14 Trade (2) 125:8;155:7 traded (1) 145:25 trades (2) 135:5;156:18 TradeStation (1) 32:13 trading (9) 28:2;84:5;132:9; 133:25;135:1; 141:12;145:1; 154:14;155:18 trail (1) 153:7 trained (2) 54:4,9 transaction (5) 125:21;129:19; 135:13,23;137:20 transcript (1) 161:3 transcription (1) 24:5 transfer (1) 138:6 transferred (2) 97:2;140:9 Travel (7) 31:14;43:8;44:19; 45:2,14;46:1,3</p>	<p>treasurer (1) 65:4 tremendous (2) 59:17,23 tried (2) 74:15;106:13 true (338) 18:8;20:20;24:22; 29:7;30:2;31:6; 32:23;33:13,25;35:2; 36:5;37:6;38:3,9; 39:1,8,25;40:5,16; 41:2,5,18,22;42:8, 17;43:12;44:3,20; 45:15;46:3,7,14,17, 21,23;47:6,14,20; 48:1,8,13;49:10,13, 20;50:1,7,10,13,17; 51:4,7,10;52:10,18, 25;54:13;55:9,13,19; 56:2;57:9;61:6,9,12, 17;62:1,24;63:2,7, 17,21,25;64:3,24; 65:5,10,15;66:4,10, 14,17;67:12,15,23; 68:2;69:20,24;70:9, 12,15,19,23;71:1,4, 17,21;72:14,16,21, 25;73:2,12,21;74:2, 3,9,13,16,25;75:7; 76:9,14,20;77:10,14, 18;78:17,18,22;79:4, 8,12,24;80:1,21; 81:1,19,25;82:22; 83:11,14,21;84:3,6, 15;85:1,5,8,12,14; 86:8,11;87:1,4,8,19, 22;88:3,7,17,20; 89:1,5,8,12,17;90:6, 9,13,18;91:2,5,10,13, 17,20,23;92:4,7,10, 12,15,19,24;93:3,5, 10,13,16,19,23;95:1, 5,10,15,19,22;96:1,4, 9,14,17,21,24;97:3,6, 10;98:12;99:5,11,14, 18,21,25;100:3,8,11, 14,18;101:15,25; 102:11,17,20;103:6, 8,20,23;104:1,9,13, 19;105:2,8,12,20,24; 106:3,7,14,19,23; 107:1,7,10,14,18,21, 24;108:3,8,12; 112:22;113:1,5,8,11, 18,21,25;114:3,6,10; 115:14,24;116:3,6,9, 14,18,22;117:7,11, 16,24;118:2,5,10,13, 16,21;119:6,17,21; 120:6,11,14,25; 121:5,18,21,25;</p>
---	--	---	--	--

122:4,8,14,17,24; 123:3,9,16;124:5; 125:23;126:1,17; 127:8;128:6,7,13; 130:7,21;133:21,25; 134:3,14;135:3,6; 141:10,13;144:11, 13,19,23;145:2,9; 154:3,15,20,24; 155:4,18;156:3,6,18, 22;157:7;158:11,14, 19;159:1,13;161:6 truly (1) 79:19 trust (2) 79:19;93:12 truth (5) 10:8;23:22,25; 30:1,4 truthful (2) 24:21;58:17 truthfully (1) 12:3 try (3) 112:16;116:2; 159:24 trying (2) 76:5;150:25 Tuesday (9) 43:1;132:2,16; 135:11,20;136:3,15; 138:4;139:12 turn (32) 24:3,8;40:7;52:25; 53:6;54:18;57:14; 58:9,20;59:11;61:19; 63:10;64:5;65:1,17; 66:19;67:8,18;68:7; 69:14;70:1,75;9; 76:22;77:8,20;79:14; 80:7;81:6;99:7; 100:5;119:23;130:9 turning (7) 56:9;136:14; 139:11;140:12; 153:23;155:2,14 twenty-ninth (1) 115:8 twice (2) 112:18;125:15 two (6) 20:1;58:10;60:22; 72:20;115:8;158:2 type (1) 76:4 types (1) 27:2 typically (1) 27:4	147:21,23;148:11 under (21) 10:8;16:21;17:14; 23:21,22;24:20;31:1; 40:8;47:18;53:7,8; 54:2,19;56:11;57:15; 58:21;60:25;63:17; 74:19;147:15;148:24 underlying (2) 148:1;151:8 unethical (3) 110:7;111:5,19 unhappy (2) 81:17;82:21 uniquely (1) 58:24 United (3) 8:1;16:22,23 Unity (5) 31:3,13,13;47:5,14 unless (1) 11:19 up (20) 10:17;39:25; 40:18;43:12;50:6,12; 67:1,11,22;68:23; 80:2;94:1,3;101:22; 106:17;109:13; 121:14;123:15; 148:5;151:12 UPC (1) 62:15 update (1) 78:4 upset (1) 74:7 upside (1) 124:11 use (2) 68:17;119:20 used (12) 16:14;20:23;21:1; 52:16,23;120:18,24; 123:15;126:7; 130:18;158:13,17 using (8) 21:5;34:24; 112:25;116:18; 118:19;122:14; 126:1;127:8	64:16 vast (2) 57:4,7 Vegas (1) 120:19 vehicles (1) 113:20 vendors (1) 65:24 venture (1) 51:22 ventures (2) 55:3;56:4 verbal (1) 10:13 verification (4) 42:3,8,11;61:20 verified (1) 62:1 verify (1) 64:2 versa (1) 56:16 version (1) 130:24 via (3) 8:16;96:17;115:16 vice (4) 46:19;48:8;56:16; 65:4 videoconference (1) 96:17 Views (6) 31:12;50:25;51:6; 121:10,14;123:24 VII (1) 65:2 violations (1) 68:10 visited (2) 88:15,19 Vliet (8) 9:10;23:15; 117:15;160:12,13, 19,23;161:11 voice (1) 8:19 Volume (2) 100:7,17 voluminous (2) 133:18;140:14 vs (1) 21:23	132:4;136:6;139:25; 141:23 watch (1) 146:16 Way (10) 14:1;19:6;24:12; 40:10;45:9;75:10; 97:20;153:14,17; 159:25 Wealth (1) 34:24 wealthy (2) 88:2,25 Web (2) 41:12,16 Wednesday (5) 73:16;131:5; 141:19;144:19,23 weekend (1) 79:16 Weigel (100) 9:1,1,5;11:22;16:1, 2,3,11,12;17:4,7; 18:2,9,14,22,24;20:5, 18;21:8,14;22:19; 23:6,8;24:16,23; 25:6,11,17;33:20; 34:8,13;35:5;36:7, 13,15,21,23;37:2; 42:12;52:12,19;53:2, 17,23;54:14;57:11; 68:3;71:6,22;73:24; 75:2,21;76:16;78:13; 81:2,21;83:15,23; 84:7;85:20;86:2; 88:8,21;107:3; 108:22,24;109:4,5; 110:8;112:5,6; 114:16;115:20; 116:11;118:23; 120:16,21;121:2; 122:11,20;123:5,12, 19;124:2,7,14,19,22; 128:14;151:14,15, 18;152:2,19,21; 158:21;159:4,14; 160:6,8 welcome (1) 62:15 Wellington (14) 12:10,20;13:1,13, 14,15;14:2;35:23; 37:22;40:10;51:15, 22;117:4;126:24 well-known (1) 84:22 What's (8) 13:3;16:10;19:7; 24:4,12;42:22; 146:20;152:4 Whereupon (1) 8:6 wherever (1)	30:14 white (1) 112:25 Whitehall (5) 105:19,22;106:13, 17;107:17 Whitehall's (2) 106:22,25 whole (3) 23:22,25;30:1 wife (6) 34:9,24;46:23; 96:6;130:1,7 William (1) 86:22 Williams (4) 49:13,15;96:12; 122:17 Wire (23) 119:10;120:1; 130:11,16;131:1,8, 14,19,24;132:4; 136:6,18;138:6,7; 139:24;140:3; 141:22;142:7,14,24; 143:10,24;145:12 withdraw (4) 91:9;95:9,12; 104:5 withdrawal (17) 62:17;81:10; 94:23;96:21;98:23; 106:6,13;120:1; 142:7,14,16,24; 143:11,25;145:12; 157:5;158:16 withdrawals (4) 95:5;102:4,15,22 withdrawing (1) 142:8 within (2) 14:12;114:10 without (2) 89:12;102:11 witness (44) 7:9,17,23;8:8; 17:9;18:3,10,15,23, 25;20:7;22:20;23:9; 24:17,24;25:7,12; 33:21;42:14;52:14, 21;53:4,19,25;54:16; 68:5;71:8,24;78:15; 81:4;83:17;86:4; 88:10,23;121:7; 128:15;148:20; 151:23;152:10; 159:16;160:5; 161:15,19,22 work (3) 135:8;141:15; 145:4 worked (1) 86:6
U	V	W		
unacceptable (3)	value (1) 30:16 Van (8) 9:10;23:15; 117:15;160:12,13, 19,23;161:11 Vargas (1) 80:16 various (5) 42:17;54:5,9,13;	Wachovia (1) 136:18 waived (1) 25:2 Washington (12) 119:10;130:11,17; 131:2,8,14,19,24;		

working (2)
93:1;101:20
world (2)
54:22;55:10
Worth (14)
15:19,20;17:6,20,
21;38:21,22;39:22;
43:23,24;48:12;
84:12,12;91:23
Wow! (1)
50:1

X

XII (1)
65:18

Y

Yahoo (3)
133:13;140:13;
144:8
year (4)
12:17;57:24;
102:22;104:6
years (11)
15:6;53:10,15;
54:22;55:1,10;56:3;
57:22;86:7;92:9;
101:22
Yolette (8)
49:13;96:12;
122:16;137:10;
139:1,7,13,16
York (2)
105:20;107:10