

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 08-81565-CIV-HURLEY//HOPKINS

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

CREATIVE CAPITAL CONSORTIUM,
LLC, A CREATIVE CAPITAL
CONCEPTS, LLC, and GEORGE
L. THEODULE,

Defendant.

DEPOSITION

OF

YOLETTE T. WILLIAMS

Genovese, Joblove & Battista
National City Building
200 East Broward Boulevard
Suite 1110
Fort Lauderdale, Florida

Tuesday, April 21st, 2009
5:30 - 7:25 p.m.
FERNANDEZ & ASSOCIATES

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1
2 APPEARANCES
3 For the Plaintiff:
4 RACHEL K. PAULOSE,
5 Securities and Exchange Commission
6 801 Brickell Avenue
7 Suite 1800
8 Miami, Florida 33131
9 (Via telephone conference)
10
11 For the Defendant:
12
13 THERESA VAN VLIET, ESQ. &
14 CARMEN CONTRERAS MARTINEZ ESQ.
15 National City Building
16 200 East Broward Boulevard
17 Suite 1110
18 Fort Lauderdale, Florida 33301
19 For the Deponent:
20 BARRY WAX, ESQ.
21 Law Offices of Barry Wax
22 777 Brickell Avenue
23 Suite 1210
24 Miami, Florida 33131
25 For Defendant George L. Theodule:
BRADFORD PATRICK, ESQ.
Law offices of Russell C.
Weigel, III
5775 Blue Lagoon Drive
Suite 100
Miami, Florida 33126
(Via telephone conference)

I N D E X

Witness	Direct	Cross
Yolette T. Williams		
(By Ms. Van Vliet)	4	
(By Mr. Wax)		100
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1 THEREUPON:
2 YOLETTE T. WILLIAMS,
3 a witness named in the notice heretofore
4 filed, having been first duly sworn, deposes
5 and says as follows:
6 DIRECT EXAMINATION
7 BY MS. VAN VLIET:
8 Q. Good afternoon, ma'am.
9 A. Good afternoon.
10 Q. I apologize for the delay, but
11 we were taking another deposition in the
12 case.
13 Could you please state your full
14 name and spell your last name, for the
15 record?
16 A. My name is Yolette Williams,
17 W-I-L-L-I-A-M-S.
18 Q. Miss Williams, have you ever
19 had your deposition taken before?
20 A. No, ma'am.
21 Q. I'm sure that your counsel has
22 gone through with you the general parameters
23 of a deposition, but let me just talk to you
24 about some of them.
25 I recognize that you may be
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2 EXHIBIT INDEX
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5 Defendant's Description Page No.
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1 invoking certain privileges here today.
2 I'll be asking you questions throughout the
3 deposition.
4 So you understand that?
5 A. Yes, ma'am.
6 Q. Please give me time to finish
7 the question all the way through, and then
8 respond, and that is done for the simple
9 reason that the court reporter can't take
10 down both of us speaking at the same time.
11 Okay?
12 A. Yes, ma'am.
13 Q. Similarly, you need to answer
14 yes or no when you answer and not just say
15 aha or uh-huh, which I have a tendency to
16 do, as well, and which we all have a
17 tendency to do, I'm sure, but she can't take
18 that down, either, and so if we can just get
19 a clear response and a clear record, then
20 that will be very helpful for everybody
21 involved.
22 A. Yes, ma'am.
23 Q. If at any point in time, you
24 need to consult with Mr. Wax privately, just
25 let us know and we'll make arrangements for
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1 that to happen.
 2 Okay?
 3 A. Yes, ma'am.
 4 Q. Similarly, I know that you're
 5 not feeling real well today. Therefore, if
 6 at any point in time, you need a break or
 7 something to drink, like coffee, tea, juice,
 8 soda, whatever, just let me know and we'll
 9 take care of that, as well.
 10 A. Thank you.
 11 Q. If you just don't feel well and
 12 need a break at any point, just let me know.
 13 I don't anticipate this being terribly long,
 14 and so with that, we'll get started with
 15 this proceeding.
 16 MS. VAN VLIET: However, prior
 17 to doing that, though, I would ask
 18 counsel who's on the telephone and in
 19 the room here to announce their
 20 appearance, for the record.
 21 MR. WAX: Barry Wax on behalf
 22 of the deponent, Yolette Williams.
 23 MS. PAULOSE: Rachel Paulose
 24 with the S.E.C.
 25 MR. BRADFORD: Bradford Patrick
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1 for Dolce Regency Suites, LLC.
 2 BY MS. VAN VLIET:
 3 Q. Miss Williams, you are the
 4 sister of George Theodule; is that correct?
 5 A. That's correct.
 6 Q. And when was the last time you
 7 spoke with your brother?
 8 A. I don't recall exactly.
 9 Q. Can you approximate for me,
 10 please?
 11 MR. WAX: Yolette, was it days
 12 ago, weeks ago or months ago?
 13 She just wants an idea.
 14 THE WITNESS: I think it's been
 15 months.
 16 BY MS. VAN VLIET:
 17 Q. Was it before or after the
 18 Receivership had been entered?
 19 A. After.
 20 Q. After?
 21 A. Yes, ma'am.
 22 ---
 23 (Thereupon, a Re-Notice of Taking
 24 Deposition was marked as Defendant's
 25 Exhibit Number YW-1 for Identification.
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1 ---
 2 BY MS. VAN VLIET:
 3 Q. I'm handing you, ma'am, what's
 4 been marked as Exhibit Number YW-1, which is
 5 a copy of the re-notice of the taking of
 6 your deposition, and I'm sure that you've
 7 had an opportunity to go through this with
 8 your counsel.
 9 Have you provided all of the
 10 documents that are called for in this
 11 Re-Notice of Taking Deposition?
 12 MR. WAX: Miss Williams has
 13 provided all of the documents which
 14 are responsive to the previous owner
 15 of the Receiver and to you, pursuant
 16 to the subpoena previously served upon
 17 her when she previously appeared in
 18 your office for deposition. She has
 19 complied pursuant to those subpoenas.
 20 Any additional documents which
 21 were not called for by the owner of
 22 the Receiver or by the original
 23 subpoena issued to her will not be
 24 produced at the present time.
 25 She's claiming her Fifth
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1 Amendment right.
 2 MS. VAN VLIET: Well, that
 3 doesn't really answer the question,
 4 Barry, of whether there are any
 5 additional documents.
 6 If there are any additional
 7 documents, then that's one thing, but
 8 you're doing a generic: She's not
 9 going to produce.
 10 That's not telling us whether
 11 or not she's doing an act of
 12 production, because if she's not, then
 13 I need to know that, just in case I
 14 need to file a Motion to Compel.
 15 I just need to know whether or
 16 not there are any additional
 17 documents.
 18 MR. WAX: There are no further
 19 documents.
 20 She has produced all documents
 21 which are responsive to the subpoena.
 22 MS. VAN VLIET: To either?
 23 MR. WAX: To either subpoena,
 24 that's correct.
 25 There are no additional
 FERNANDEZ & ASSOCIATES

<p style="text-align: right;">Page 10</p> <p>1 documents, I believe, and I just want 2 to make it clear, because I think that 3 I gave to Carmen the Yopana documents. 4 MS. CONTRERAS MARTINEZ: I 5 don't have them. 6 MR. WAX: I haven't given them 7 to you? 8 MS. VAN VLIET: Apparently not. 9 MR. WAX: Well, Yopana is not 10 even in here, so yes, we've produced 11 everything that is responsive to all 12 of the subpoenas. 13 MS. VAN VLIET: Well, you had 14 earlier agreed to provide Yopana 15 records, as well, so I can get you a 16 subpoena for it, if you want, 17 MR. WAX: I would rather you 18 get me a subpoena for Yopana. 19 MS. VAN VLIET: Okay. I'll get 20 you a separate subpoena. 21 However, please note, for the 22 record, that we're not waiving our 23 position that it's still responsive, 24 since the documents with regard to 25 Yopana relate to many of the other FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 12</p> <p>1 A. D.M.C.I. started in March. 2 Q. Of what year? 3 A. 2008. 4 Q. Did you direct the filing of 5 the corporate documents for that company, 6 D.M.C.I.? 7 A. I'm sorry? 8 MR. WAX: Do you understand the 9 question? 10 THE WITNESS: No. 11 MS. VAN VLIET: If you don't 12 understand the question, then just 13 tell me you don't understand it and 14 I'll rephrase it. 15 THE WITNESS: I don't 16 understand. 17 BY MS. VAN VLIET: 18 Q. Did you do the paperwork to 19 open the corporation for D.M.C.I.? 20 A. Actually, no. 21 Q. Who did? 22 A. It was Kathy. 23 Q. Kathy who? 24 A. She's with Simms. Parker. 25 Kathleen Parker. FERNANDEZ & ASSOCIATES</p>
<p style="text-align: right;">Page 11</p> <p>1 individuals listed in the original 2 subpoena, but it's easier just to do a 3 new one. 4 BY MS. VAN VLIET: 5 Q. Miss Williams, in addition to 6 Yopana, which is a corporation we just 7 mentioned briefly, were you the president of 8 any investment clubs? 9 A. Besides the D.M.C.I., that was 10 it. 11 Q. And Miss Williams, I realize 12 that you and I have talked before, but we've 13 never had a discussion on the record, so it 14 may seem like I'm asking you questions that 15 I should know the answer to, but the reason 16 I'm asking you these questions again now is 17 so that I can get them on the record. 18 Do you understand that? 19 A. Yes, ma'am. 20 Q. D.M.C.I., for the record, is 21 Dream Makers Capital Investment; is that 22 correct? 23 A. That's correct. 24 Q. And when did you become the 25 president of D.M.C.I.? FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Kathleen Parker? 2 A. Yes, ma'am. 3 Q. And according to Sunbiz 4 records, Dream Maker Capital Investments, 5 LLC was filed or the opening paperwork was 6 filed on January 18th, 2008. 7 Does that sound about right? 8 A. Actually, that one was done by 9 someone else. 10 MR. WAX: That's not the 11 question she asked you. 12 She asked you if that date of 13 formation sounded right. 14 What's the answer to that 15 question? 16 THE WITNESS: Yes. 17 MR. WAX: I really need for you 18 to just listen to her question and 19 answer her question. That's all. 20 Thank you. 21 THE WITNESS: Yes, sir. 22 BY MS. VAN VLIET: 23 Q. So you said that the 24 corporation was formed on January 18th, 2008 25 by someone else, not Kathy Parker; is that FERNANDEZ & ASSOCIATES</p>

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<p>1 correct?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Who is that someone else?</p> <p>4 A. I can't remember her name. She</p> <p>5 was just in the office, and then she went on</p> <p>6 the computer and helped me go through that</p> <p>7 process. That was the LLC.</p> <p>8 Q. And when you say she was in the</p> <p>9 office, are you referring to Creative</p> <p>10 Capital Consortium's office?</p> <p>11 A. No.</p> <p>12 Q. Whose office are you referring</p> <p>13 to?</p> <p>14 A. I don't know whose office it</p> <p>15 was at the time. I don't really know their</p> <p>16 names.</p> <p>17 Q. Where was the office? Let's</p> <p>18 start there.</p> <p>19 A. It was in Lake Worth.</p> <p>20 Q. Is that the same place where</p> <p>21 Creative Capital Consortium had its offices?</p> <p>22 A. Yes, but it was not the same</p> <p>23 office.</p> <p>24 Q. Not the same suite?</p> <p>25 A. Not the same suite.</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 A. Yes, ma'am.</p> <p>2 Q. What I'm asking you is: What's</p> <p>3 the first office you went to?</p> <p>4 Did you first go to Creative</p> <p>5 Capital Consortium, LLC?</p> <p>6 A. I guess that was their office.</p> <p>7 I don't know.</p> <p>8 Q. Where did Lola work?</p> <p>9 A. For Creative Capital</p> <p>10 Consortium.</p> <p>11 Q. So you go in and talk to Lola,</p> <p>12 who works at Creative Capital Consortium,</p> <p>13 and you ask her for help to start Dream</p> <p>14 Makers Capital Investment; is that correct?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Where did you get the idea to</p> <p>17 start an investment club?</p> <p>18 A. I was interested in doing a</p> <p>19 club because everyone else was doing it.</p> <p>20 Q. And when you say that everyone</p> <p>21 else was doing it, do you mean other members</p> <p>22 of your family?</p> <p>23 A. No.</p> <p>24 Q. Who do you mean when you say</p> <p>25 "everyone else"?</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>
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<p>1 Q. Was that another investment</p> <p>2 club?</p> <p>3 A. I don't know if it was an</p> <p>4 investment club.</p> <p>5 Q. Well, what was your reason to</p> <p>6 be in this office, then?</p> <p>7 How were you connected to</p> <p>8 office?</p> <p>9 A. I came to the office because I</p> <p>10 needed help with the filing of the</p> <p>11 corporation papers.</p> <p>12 Q. Did you know somebody in the</p> <p>13 office when you got there or did you just</p> <p>14 walk in off the street and ask for help?</p> <p>15 A. No, ma'am. I went to the</p> <p>16 office, and then they told me in this office</p> <p>17 that someone could help me.</p> <p>18 Q. You went to the office, and</p> <p>19 then they showed you the other office?</p> <p>20 A. Yes.</p> <p>21 Q. What's the first office that</p> <p>22 you went to?</p> <p>23 A. I went to Lola, and then I was</p> <p>24 referred to another office.</p> <p>25 Q. Lola is a person?</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 A. There were a lot of people</p> <p>2 doing clubs.</p> <p>3 Q. Who?</p> <p>4 A. I don't know them, but there</p> <p>5 was just a lot of people. There were a lot</p> <p>6 of people around the office and they wanted</p> <p>7 to open clubs, and I was interested in</p> <p>8 opening my own club at that time.</p> <p>9 Q. You said that there were a lot</p> <p>10 of people around the office opening clubs;</p> <p>11 is that correct?</p> <p>12 A. Yes.</p> <p>13 Q. First of all, what office are</p> <p>14 you referring to?</p> <p>15 A. I'm sorry?</p> <p>16 Q. What office are you referring</p> <p>17 to?</p> <p>18 A. Well, when I was in Magda and</p> <p>19 Mille's office in Lake Worth, they had a lot</p> <p>20 of people there and they had the clubs.</p> <p>21 There were many people there that were</p> <p>22 interested in doing clubs, as well.</p> <p>23 Q. Let me interrupt you for a</p> <p>24 moment.</p> <p>25 Where did Magda and Mille work?</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>

<p style="text-align: right;">Page 18</p> <p>1 A. In Lake Worth.</p> <p>2 Q. What business did they work</p> <p>3 for?</p> <p>4 A. Creative Capital Consortium, I</p> <p>5 believe.</p> <p>6 Q. Did you visit them at their</p> <p>7 offices, meaning the Creative Capital</p> <p>8 Consortium offices, in Lake Worth?</p> <p>9 A. Yes, I did.</p> <p>10 Q. And as I understand it, when</p> <p>11 you visited them, you saw a lot of people</p> <p>12 that were investors or club presidents; is</p> <p>13 that right?</p> <p>14 A. That's right.</p> <p>15 Q. And it was based on that that</p> <p>16 you decided that you wanted to open up a</p> <p>17 club; is that right?</p> <p>18 A. That's right.</p> <p>19 Q. Why did you want to open a</p> <p>20 club?</p> <p>21 A. At the time, I was unemployed</p> <p>22 and they told me that it was just</p> <p>23 investments.</p> <p>24 Q. Who told you it was just</p> <p>25 investments?</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 20</p> <p>1 investors that invested with them.</p> <p>2 Q. Let me interrupt you for a</p> <p>3 moment, because we can't just have a lot of</p> <p>4 "they" and "the."</p> <p>5 When you say "they already had</p> <p>6 a lot of investors who invested with them,"</p> <p>7 who is "they"?</p> <p>8 A. We're talking about Magda and</p> <p>9 Mille.</p> <p>10 Q. And when you say "they invested</p> <p>11 with them," do you mean people invested with</p> <p>12 Magda and Mille or with their clubs?</p> <p>13 A. Yes.</p> <p>14 Q. First of all, what was Magda's</p> <p>15 club's name?</p> <p>16 A. I think it was ambassador.</p> <p>17 Q. How about Mille?</p> <p>18 A. They worked together.</p> <p>19 Q. So Magda and Mille told you</p> <p>20 that they already had a lot of people</p> <p>21 investing in their clubs?</p> <p>22 A. And I was there in the office</p> <p>23 and I saw a lot of people there, too.</p> <p>24 Q. Did they tell you how much</p> <p>25 money they had made?</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Well, Magda and Mille had been</p> <p>2 doing it, and so they told me: You know,</p> <p>3 everybody is opening clubs up, and that was</p> <p>4 the only reason that I did it.</p> <p>5 Q. Go ahead.</p> <p>6 A. That's why I decided to do it.</p> <p>7 Q. I interrupted you. I</p> <p>8 apologize.</p> <p>9 A. That's okay. I was finished.</p> <p>10 I just was there to, you know,</p> <p>11 see them, and that's when they told me about</p> <p>12 the clubs. That's about it.</p> <p>13 Q. Did they tell you how much</p> <p>14 money you, personally, were going to make if</p> <p>15 you opened up a club?</p> <p>16 A. No.</p> <p>17 Q. How much money did you expect</p> <p>18 that you would make if you opened up a club?</p> <p>19 A. I didn't know how much. You</p> <p>20 can't calculate something like that because</p> <p>21 you don't know how many investors you're</p> <p>22 going to have.</p> <p>23 Q. And where were you going to</p> <p>24 find these investors?</p> <p>25 A. Well, they already had</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 21</p> <p>1 A. No.</p> <p>2 Q. Did they give you any ball park</p> <p>3 figure?</p> <p>4 A. No.</p> <p>5 Q. So then, you had no idea</p> <p>6 whether it was going to be one dollar that</p> <p>7 you were going to make or a hundred thousand</p> <p>8 dollars.</p> <p>9 Is that what you're telling me?</p> <p>10 A. No. I didn't know.</p> <p>11 Q. And were you going to be</p> <p>12 investing any money?</p> <p>13 A. Yes.</p> <p>14 Q. Where were you going to get the</p> <p>15 money that you were going to invest?</p> <p>16 A. From my account.</p> <p>17 Q. And where had you gotten the</p> <p>18 money that was in your account?</p> <p>19 A. It was my money that I had.</p> <p>20 Q. From where?</p> <p>21 What was the source?</p> <p>22 A. From working.</p> <p>23 Q. Well, after that point in time,</p> <p>24 you got money from your brother; is that</p> <p>25 right?</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>

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<p>1 A. I'm sorry?</p> <p>2 Q. After this point in time, you</p> <p>3 received money from your brother, George; is</p> <p>4 that right?</p> <p>5 A. After which point in time?</p> <p>6 Q. After you had this conversation</p> <p>7 with Magda and Mille.</p> <p>8 A. No.</p> <p>9 Q. Did you get that money before</p> <p>10 then?</p> <p>11 A. What money?</p> <p>12 Q. How much money have you ever</p> <p>13 received in transfers from your brother or</p> <p>14 loans?</p> <p>15 A. I don't know. I can't give you</p> <p>16 a ball park figure as to that.</p> <p>17 Q. We'll get back to that in a</p> <p>18 moment. We got it.</p> <p>19 A. Okay.</p> <p>20 ---</p> <p>21 (Thereupon, a Declaration of</p> <p>22 Yolette T. Williams was marked as</p> <p>23 Defendant's Exhibit Number GA-2 for</p> <p>24 Identification.</p> <p>25 ---</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 I really didn't mean to eavesdrop, but I</p> <p>2 believe you said that there was a</p> <p>3 correction; is that correct?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Where would that be?</p> <p>6 A. This was not a Creative Capital</p> <p>7 Consortium meeting. That's not supposed to</p> <p>8 be there.</p> <p>9 MR. WAX: For the record, it's</p> <p>10 paragraph 24 (c) on page 3.</p> <p>11 BY MS. VAN VLIET:</p> <p>12 Q. So in other words, it says that</p> <p>13 this was not a CCC meeting, but it should</p> <p>14 say that it was?</p> <p>15 A. That's correct.</p> <p>16 Q. Did you draft this affidavit?</p> <p>17 A. No, ma'am.</p> <p>18 Q. Who drafted it for you?</p> <p>19 A. Mr. Weigel.</p> <p>20 Q. And that's your brother's</p> <p>21 lawyer, right?</p> <p>22 A. Yes.</p> <p>23 Q. By the way, when I say "your</p> <p>24 brother", I'm referring to your brother</p> <p>25 George, because I know you have more than</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>
Page 23	Page 25
<p>1 BY MS. VAN VLIET:</p> <p>2 Q. For the record, Exhibit Number</p> <p>3 YW-2 is a copy of the Declaration that you</p> <p>4 filed in opposition to expanding the</p> <p>5 Receivership to Dream Maker Capital</p> <p>6 Investment; is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. Do you recall filing this?</p> <p>9 MR. WAX: Objection to the form</p> <p>10 of the question.</p> <p>11 She didn't file it.</p> <p>12 BY MS. VAN VLIET:</p> <p>13 Q. Excuse me.</p> <p>14 Do you recall executing it?</p> <p>15 A. I'm reading it.</p> <p>16 Q. Are you finished reviewing the</p> <p>17 document?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. Did you execute that</p> <p>20 declaration?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. And is it true and is it</p> <p>23 correct, to the best of your knowledge?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. I believe you said that -- and</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 one brother.</p> <p>2 Do you understand that?</p> <p>3 A. Yes.</p> <p>4 Q. Now, you indicated that your</p> <p>5 address is 8030 North Nob Hill Road, number</p> <p>6 104. Tamarac, Florida. 33321; is that</p> <p>7 correct?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. You also own another</p> <p>10 condominium; is that right?</p> <p>11 A. Right.</p> <p>12 Q. And is that condominium in the</p> <p>13 same development?</p> <p>14 A. Yes.</p> <p>15 Q. You're going to have to speak</p> <p>16 up for the court reporter and the folks on</p> <p>17 the phone.</p> <p>18 A. I'm sorry.</p> <p>19 Q. And that was a condominium</p> <p>20 which you purchased with money that had been</p> <p>21 transferred to you by your brother; is that</p> <p>22 right?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. And I believe in our prior</p> <p>25 discussions, you've indicated that that</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>

<p style="text-align: right;">Page 26</p> <p>1 money was a gift; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. And you knew that that money</p> <p>4 came from or you know now, at least, that</p> <p>5 that money came from Creative Capital</p> <p>6 Consortium; is that right?</p> <p>7 A. Now, yes.</p> <p>8 Q. In addition to that money that</p> <p>9 was transferred to you from Creative Capital</p> <p>10 Consortium, LLC for the purpose of your</p> <p>11 investment in the condominium, have you</p> <p>12 received any other monies from your brother,</p> <p>13 George?</p> <p>14 A. There was money deposited for</p> <p>15 me for payroll.</p> <p>16 Q. And that was the payroll that</p> <p>17 you paid out of your Yopana account; is that</p> <p>18 right?</p> <p>19 A. My personal and Yopana, yes,</p> <p>20 ma'am.</p> <p>21 Q. We'll get to that in a minute.</p> <p>22 Other than those two areas, are</p> <p>23 there any other monies that were transferred</p> <p>24 to you by your brother?</p> <p>25 A. I don't recall. You will have FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 28</p> <p>1 that correct?</p> <p>2 I'm sorry.</p> <p>3 You say that it was independent</p> <p>4 of Creative Capital Consortium, LLC; is that</p> <p>5 correct?</p> <p>6 A. Yes, ma'am.</p> <p>7 MR. WAX: Which paragraph are</p> <p>8 you in?</p> <p>9 BY MS. VAN VLIET:</p> <p>10 Q. I'm on paragraph 8.</p> <p>11 Do you see that, Miss Williams?</p> <p>12 A. The D.M.C.I. was a club just</p> <p>13 like any other.</p> <p>14 Q. Do you see where you say: To</p> <p>15 my knowledge, the investment club, referring</p> <p>16 to D.M.C.I., was independent of Creative</p> <p>17 Capital Consortium, LLC and was independent</p> <p>18 of any other investment club?</p> <p>19 Do you see where you say that</p> <p>20 in your signed Declaration, ma'am?</p> <p>21 A. Yes, I do.</p> <p>22 Q. Dream Makers Capital Investment</p> <p>23 was an investment club; is that correct?</p> <p>24 A. That's correct.</p> <p>25 Q. The purpose of the club was to FERNANDEZ & ASSOCIATES</p>
<p style="text-align: right;">Page 27</p> <p>1 to produce the documents.</p> <p>2 Q. You can't remember any other</p> <p>3 money?</p> <p>4 A. No, I can't.</p> <p>5 Q. Do you have any other bank</p> <p>6 accounts, other than the ones that you've</p> <p>7 told us about?</p> <p>8 A. No, I don't.</p> <p>9 Q. Do you have any other assets</p> <p>10 anywhere in the world, whether under your</p> <p>11 name or under someone else's name, that you</p> <p>12 haven't told us about?</p> <p>13 A. No, I don't.</p> <p>14 Q. Now, you made this Declaration</p> <p>15 on behalf of Dream Makers Capital Investment</p> <p>16 to object to the expansion of the</p> <p>17 Receivership; is that correct?</p> <p>18 A. I did it because of what they</p> <p>19 were saying, which was all lies.</p> <p>20 Q. Do you even know why your</p> <p>21 Declaration was filed?</p> <p>22 A. No. I was just defending</p> <p>23 D.M.C.I.</p> <p>24 Q. You say that D.M.C.I. is not</p> <p>25 related to Creative Capital Consortium; is FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 29</p> <p>1 make investments; is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. And how many members did you</p> <p>4 have?</p> <p>5 A. Less than a hundred.</p> <p>6 Q. Take a look at the first</p> <p>7 sentence in paragraph 7.</p> <p>8 Would that refresh your</p> <p>9 recollection that you had approximately</p> <p>10 ninety members?</p> <p>11 A. I believe that we had just a</p> <p>12 few more.</p> <p>13 Q. And of that, how much money did</p> <p>14 Dream Makers take in, in terms of</p> <p>15 investment?</p> <p>16 A. I believe I produced all of</p> <p>17 those papers to you already.</p> <p>18 Q. I understand that you did,</p> <p>19 ma'am.</p> <p>20 I'm just asking you a question.</p> <p>21 That is, after all, why we're here.</p> <p>22 A. I don't know the exact amount,</p> <p>23 ma'am. That's why I say that.</p> <p>24 Q. Just so you know, I don't know</p> <p>25 is an okay answer. FERNANDEZ & ASSOCIATES</p>

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<p>1 A. Okay, then.</p> <p>2 Q. How many payments did Dream</p> <p>3 Makers Capital Investments receive from</p> <p>4 Creative Capital Consortium, LLC?</p> <p>5 A. I don't know that exact figure.</p> <p>6 ---</p> <p>7 (Thereupon, a Payment Ledger was</p> <p>8 marked as Defendant's Exhibit Number</p> <p>9 YA-3 for Identification.</p> <p>10 ---</p> <p>11 BY MS. VAN VLIET:</p> <p>12 Q. For the record, I'm handing you</p> <p>13 what has been marked as Exhibit Number YW-3.</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. Would you take a look at that</p> <p>16 for me, please?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Ma'am, I've handed you Exhibit</p> <p>19 number YW-3, which, for the record, is an</p> <p>20 analysis by Capilla & Company of payments to</p> <p>21 Dream Makers Capital Investment based on the</p> <p>22 various bank records and wire transfers and</p> <p>23 checks, and it appears that that amount was</p> <p>24 one million one hundred and sixty thousand</p> <p>25 seven hundred and seventy-one dollars and</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 paperwork with me that has my backup stuff</p> <p>2 in it which tells me exactly what it is, so</p> <p>3 that would be very difficult.</p> <p>4 MR. WAX: She's going to direct</p> <p>5 you through each page, wherever you</p> <p>6 want to start.</p> <p>7 BY MS. VAN VLIET:</p> <p>8 Q. Turn to the second page.</p> <p>9 Do you see a deposit into the</p> <p>10 Capital Creative Consortium account of</p> <p>11 seventy-three thousand eight hundred</p> <p>12 dollars?</p> <p>13 I'm sorry. This was from you,</p> <p>14 I should say.</p> <p>15 When you were depositing</p> <p>16 transfers to Creative Capital Consortium,</p> <p>17 what was that for?</p> <p>18 A. That was from investors.</p> <p>19 Q. Look at the page right after</p> <p>20 that.</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. The first page refers to a</p> <p>23 counter deposit on May 14th into Creative</p> <p>24 Capital Consortium's account. The second</p> <p>25 page is the deposit ticket.</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>
Page 31	Page 33
<p>1 ninety-four cents.</p> <p>2 Does that sound about right?</p> <p>3 A. For what clubs?</p> <p>4 Q. For Dream Makers Capital</p> <p>5 Investment and Dream Makers Investment Club.</p> <p>6 A. That's Georgia's in Dream</p> <p>7 Makers of Coral Springs.</p> <p>8 Q. I understand.</p> <p>9 My question is: Does that</p> <p>10 number sound about right, in terms of</p> <p>11 transfers from Creative Capital into Dream</p> <p>12 Makers Investment Club and Dream Makers</p> <p>13 Investment Club South?</p> <p>14 A. That sounds about right.</p> <p>15 Q. Now, let's round it down a</p> <p>16 little bit.</p> <p>17 What were those transfers for?</p> <p>18 A. What transfers?</p> <p>19 MR. WAX: These transfers.</p> <p>20 THE WITNESS: I'd have to go</p> <p>21 through each one of them and tell you</p> <p>22 exactly why.</p> <p>23 BY MS. VAN VLIET:</p> <p>24 Q. You can do that.</p> <p>25 A. I mean, I don't have my</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. The next page is a check, a</p> <p>4 cashier's check, a bank check, to CCC in the</p> <p>5 same amount the day before, May 13th, from</p> <p>6 Dream Makers Capital Investment.</p> <p>7 Do you see that?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. These were investments of your</p> <p>10 ninety somewhat investors that you placed</p> <p>11 with Creative Capital; is that correct?</p> <p>12 MR. WAX: Theresa, I'm confused</p> <p>13 and I have to say why.</p> <p>14 MS. VAN VLIET: There's the</p> <p>15 deposit side and here's the withdrawal</p> <p>16 side.</p> <p>17 MR. WAX: What's interesting is</p> <p>18 that your summary says that in the</p> <p>19 Wachovia 4170 account, there's a check</p> <p>20 payable to Dream Makers Capital</p> <p>21 Investments, but they're the payee,</p> <p>22 not the payer, and that's a check</p> <p>23 payable to Dream Makers in the amount</p> <p>24 of seventy-three thousand dollars and</p> <p>25 change.</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>

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<p>1 MS. VAN VLIET: Ignore the word 2 "payee." Look at deposit 3 disbursement. 4 They deposited approximately 5 one million one hundred and sixty 6 thousand in the two clubs. We're 7 going to go through each one, so don't 8 worry about it. 9 MR. WAX: That summary is 10 entitled: Payment to Dream Makers 11 Investment Club and Dream Makers 12 Investment Club South. 13 It's entitled payments to them, 14 not payments from them. 15 MS. VAN VLIET: Let me have 16 them, please. I'll make it easier for 17 you. 18 MR. WAX: Are you telling me, 19 and I just want to make sure that 20 we're clear here, that where it says 21 that Dream Makers is the payee, they 22 are now the payer? 23 MS. VAN VLIET: I've now 24 amended the exhibit. There's no payee 25 or payer. There's just a list of FERNANDEZ & ASSOCIATES</p>	<p>1 revenues or deposits for Dream Makers. 2 MS. VAN VLIET: Stop, please. 3 Just let me ask her a question. 4 BY MS. VAN VLIET: 5 Q. My understanding, Miss 6 Williams, based on our prior conversations 7 and based on the records, is that Dream 8 Makers South and Dream Makers Investment 9 Club deposited approximately one million one 10 hundred and sixty thousand dollars and 11 change of its investors money with Creative 12 Capital Consortium, LLC. 13 Does that sound about right? 14 A. Deposited? 15 Q. Gave it to Creative Capital 16 Consortium to invest. 17 Does that sound about right, 18 Miss Williams? 19 A. That sounds about right. 20 Q. And my understanding is that 21 you got back about two hundred thousand 22 dollars and change; is that correct? 23 A. To disburse to the investors? 24 Q. I don't know. 25 A. We have backup documents for FERNANDEZ & ASSOCIATES</p>
Page 35	Page 37
<p>1 Dream Makers Capital Investment South, 2 and then there's a column that says 3 "deposit" and there's a column that 4 says "disbursements." This is 5 essentially payments to and payments 6 from Dream Makers. 7 MR. WAX: So the first deposit 8 that you're referring to with a 9 clearing day of May 14th is reflected 10 on page 3 of this exhibit as a deposit 11 made to the Creative Capital 12 Investments account? 13 MS. VAN VLIET: Correct. 14 MR. WAX: That being the May 15 14th deposit? 16 MS. VAN VLIET: That she 17 deposited. 18 MR. WAX: You see, now that 19 makes her earlier answer incorrect, 20 because what you asked her was a 21 different question. 22 MS. VAN VLIET: I asked her if 23 she deposited this amount. 24 MR. WAX: That's not correct. 25 You presented this to her as FERNANDEZ & ASSOCIATES</p>	<p>1 that. We provided those to you. 2 Q. That's about two hundred 3 thousand dollars; is that correct? 4 A. I don't know that. I really 5 don't know those numbers off the top of my 6 head. 7 MR. WAX: I just want to make 8 sure we're clear. 9 Is this spread sheet based on 10 the documents that she provided from 11 Dream Makers? 12 MS. VAN VLIET: I'm not going 13 to go through all of them. 14 I'm just referring to what's on 15 the documents that are attached to 16 this, some of which she may have 17 provided to us and some of which she 18 didn't, Barry. 19 The backup is there. 20 She made a statement that Dream 21 Makers is independent of Creative 22 Capital Consortium, so I'm going 23 through the amount of investments that 24 she made with CCC with Dream Makers, 25 and then I'm going to find out what FERNANDEZ & ASSOCIATES</p>

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<p>1 other investments she made. It's 2 pretty simple. 3 BY MS. VAN VLIET: 4 Q. By the way, did you invest one 5 single solitary penny of any other Dream 6 Maker Capital Investment account with 7 anybody else but Creative Capital 8 Consortium? 9 A. No. 10 Q. So the first deposit of Dream 11 Makers money into Creative Capital 12 Consortium was on May 14th to the tune of 13 seventy-three thousand eight hundred dollars 14 and sixty cents; is that right? 15 MR. WAX: Here's the check. 16 THE WITNESS: This is coming 17 from Georgia South, and the reason you 18 know that is because of the number 19 sixty at the end of it. Every club 20 had a code. 21 MR. WAX: That's not the 22 question. 23 The question is: Was this 24 deposit made from Dream Makers to 25 Creative Capital on May 14th, 2008? FERNANDEZ & ASSOCIATES</p>	<p>1 A. We did. 2 Q. My question to you is this: 3 You had to transfer them back and forth 4 between the two, didn't you? 5 A. Between what? 6 Q. Between Dream Makers Capital 7 Investment South and Dream Makers Investment 8 Club. 9 You transferred money between 10 the two, didn't you? 11 A. Whatever Georgia South 12 transferred, we transferred it to Creative 13 Capital Consortium. 14 Q. Is it your testimony that you 15 never transferred money between the two 16 Dream Makers clubs? 17 Do you understand the question? 18 A. No, ma'am. 19 Q. There's Dream Makers Georgia; 20 is that correct? 21 A. Yes, ma'am. 22 Q. And that had a bank account; is 23 that right? 24 A. Yes, ma'am. 25 Q. There's Dream Makers Florida; FERNANDEZ & ASSOCIATES</p>
Page 39	Page 41
<p>1 That's the question. 2 Please answer the question. 3 THE WITNESS: Yes. 4 BY MS. VAN VLIET: 5 Q. Did you ever transfer money 6 between Dream Makers Investment Club, a 7 Florida limited liability corporation, and 8 Dream Makers Capital Investment South? 9 Do you not understand the 10 question? 11 A. No. 12 Q. Did you ever transfer money 13 between Dream Makers Florida and Dream 14 Makers Georgia? 15 A. That's the way we had to do it 16 with Georgia and Florida. 17 Q. So at any point in time, can 18 you tell me whether all of the money that 19 came in from Georgia was just from Georgia 20 investors or may it have been from Florida 21 investors? 22 A. Georgia investors were 23 separate. We kept separate records. 24 Q. I understand that you kept 25 separate records. FERNANDEZ & ASSOCIATES</p>	<p>1 is that right? 2 A. Right. 3 Q. And it had a bank account; is 4 that right? 5 A. Yes. 6 Q. Did you ever send money between 7 those two bank accounts? 8 A. We managed the bank accounts. 9 Q. It's a simple question, ma'am. 10 A. I don't know what you mean. 11 Q. You had the Florida bank 12 account and you had the Georgia bank 13 account. 14 Did you ever send money between 15 the two? 16 A. I don't really know. 17 Q. If you don't remember, then you 18 don't remember. 19 A. I don't recall that there was a 20 Georgia account. That account was closed. 21 Q. Okay. Let's refer to the 22 Wachovia Bank account, ma'am, 23 I'm going to have to go through 24 every single one, Georgia and Florida, then, 25 because you can't remember. FERNANDEZ & ASSOCIATES</p>

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1 A. I'm sorry, but I can't
 2 remember.
 3 Q. That's fine, but then I've got
 4 to go through both. I recognize that some
 5 are Georgia and some are Florida, but since
 6 you can't remember and I don't have the
 7 exhibits, then we've got to go through all
 8 of them, because you're saying that Dream
 9 Makers Capital Investment is independent of
 10 Creative Capital Consortium, LLC.
 11 A. Right.
 12 Q. Let me see if I can shortcut
 13 it, without going through each and every one
 14 of these transfers.
 15 Am I correct in stating that
 16 every single voluntary investment, meaning
 17 every investment that was taken in from
 18 investors in Dream Makers Investors Club,
 19 LLC Florida went to Creative Capital
 20 Consortium, LLC?
 21 A. Yes, ma'am.
 22 Q. Am I correct in stating that
 23 every single voluntary cent of money that
 24 you took in from investors in Dream Makers
 25 Capital Investment South Georgia went into
 FERNANDEZ & ASSOCIATES

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1 Creative Capital Consortium?
 2 A. Yes, ma'am.
 3 Q. You never invested in anything
 4 else?
 5 A. No, ma'am.
 6 Q. And you never talked about or
 7 thought about investing in anything else?
 8 A. Yes, I did. I did mention that
 9 to my investors.
 10 Q. What else did you mention to
 11 your investors?
 12 Did you mention that you were
 13 going to invest?
 14 A. I hereby invoke my Fifth
 15 Amendment right against self-incrimination.
 16 Q. Were you present in any
 17 investor meetings where your brother, your
 18 brother George, informed investors that he
 19 was looking at the purchase and acquisition
 20 of hotel condos in Orlando?
 21 MR. WAX: You can answer that
 22 question.
 23 THE WITNESS: I don't recall.
 24 MR. WAX: That's your answer?
 25 THE WITNESS: Yes, sir.
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1 BY MS. VAN VLIET:
 2 Q. Did you attend a party for your
 3 brother in Orlando in May of 2008?
 4 A. Yes, ma'am.
 5 Q. At that time, a number of
 6 investors and club presidents were present,
 7 were they not?
 8 A. Yes, ma'am.
 9 Q. Among those were an individual
 10 by the name of Gerson Coramides, is that
 11 correct?
 12 A. Yes, ma'am.
 13 Q. And you know Mr. Coramides; is
 14 that right?
 15 A. I believe he has a club.
 16 Q. As a matter of fact, he has two
 17 clubs in the Orlando area, one called the
 18 Advantaged Investor Group and one called --
 19 well, I can't remember the name of the other
 20 one, but you know that, correct?
 21 A. I can't remember.
 22 Q. Mr. Coramides is one of the
 23 individuals who introduced your brother into
 24 the Dolce Regency Hotel and Condominium deal
 25 in Orlando; isn't that true?
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1 A. I wouldn't know.
 2 Q. Were you present on any of the
 3 occasions when your brother and Gerson
 4 Coramides brought an entourage of investors
 5 to look at the property in Orlando?
 6 A. I was present one time.
 7 Q. Was that the first time or the
 8 second time?
 9 A. The first time.
 10 Q. And the first time, you also
 11 met or also present there was a gentleman by
 12 the name of Carlos Bonilla; isn't that
 13 right?
 14 A. I don't know Mr. Bonilla.
 15 Q. Did you tour the
 16 hotel/condominium property?
 17 A. No, ma'am.
 18 Q. Why not?
 19 A. I really wasn't feeling well
 20 that day.
 21 Q. What did you do?
 22 A. I stayed in the car.
 23 Q. And who else was there besides
 24 you?
 25 How many investors or how many
 FERNANDEZ & ASSOCIATES

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<p>1 people were there? 2 A. I don't know, because I was 3 with my mom in the car. Like I said, I 4 didn't feel well. 5 Q. You were with your mom in the 6 car, right? 7 A. Yes, ma'am. 8 Q. Did you see any other cars 9 around? 10 A. There were other cars, yes, 11 ma'am. 12 Q. About how many other cars were 13 there? 14 A. I don't recall. 15 Q. Did you see two other people 16 get out with your brother? 17 A. I don't know exactly how many 18 people there were. 19 Q. Could you approximate for me? 20 A. I can't. I wasn't well. I sat 21 in the back seat of the car. 22 Q. After that, did you all go out 23 to dinner? 24 A. I think so. 25 Q. Do you know an individual by FERNANDEZ & ASSOCIATES</p>	<p>1 investment. 2 Q. Who was showing you his new 3 investment? 4 A. George. 5 Q. Who was he showing his new 6 investment to? 7 A. Some people that were there 8 with him. 9 Like I said, there were some 10 people in the cars that followed him. I 11 don't know who they were. 12 Q. And you're saying that he had 13 already made the investment at that time; is 14 that correct? 15 A. I really have no idea about 16 that. 17 Q. If Creative Capital Consortium 18 only got about two hundred and twelve -- I'm 19 sorry. 20 If Dream Makers only got about 21 two hundred and twelve thousand dollars back 22 from Creative Capital Consortium, what 23 happened to the rest of the money? 24 A. What do you mean? 25 Q. A total of one million one FERNANDEZ & ASSOCIATES</p>
Page 47	Page 49
<p>1 the name of Mark Rene? 2 A. Yes. 3 Q. He was present at that first 4 visit for Dolce Regency Suites, LLC, when 5 your brother pitched the two investors, too 6 wasn't he? 7 A. I'm sorry. I don't recall if I 8 was present or not. 9 Q. Do you know an individual by 10 the name of German Cardona? 11 A. No, ma'am. 12 Q. Do you know an individual by 13 the name of Dan Harper? 14 A. No, ma'am. 15 Q. At any point in time, do you 16 know whether your brother pitched the 17 purchase of a hotel/condo property in 18 Orlando to any investor? 19 A. Not that I know of. 20 Q. What was the purpose, then, of 21 your travels out to the Dolce Regency Suites 22 site for a visit when you were sick out 23 there? 24 What was the purpose of that? 25 A. He was just showing us his new FERNANDEZ & ASSOCIATES</p>	<p>1 hundred and sixty thousand seven hundred and 2 seventy-one dollars and ninety-four cents 3 was entrusted to you for investment by your 4 club members; isn't that right? 5 A. Yes. It was invested with 6 Creative Capital Consortium. 7 Q. And you only got approximately 8 two hundred and twelve thousand dollars as a 9 return on your investment. 10 What happened to the rest of 11 it? 12 A. The rest of it is with Creative 13 Capital Consortium. It's still invested in 14 Creative Capital Consortium. It's only if 15 people request any money back that they get 16 their money back. 17 Q. You're certainly aware of the 18 fact that there is no money left in CCC; is 19 that correct? 20 A. I'm aware of it now, but I was 21 not aware of the fact that there was no 22 money left before. 23 Q. You were the club president. 24 These people entrusted their livelihoods and 25 their money to you. FERNANDEZ & ASSOCIATES</p>

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1 A. Right.

2 Q. Did you ever even bother to

3 check what was happening with this one

4 million dollars from March 13th, 2008, when

5 you started the investment, through

6 September 15th, 2008, when you sent your

7 last one in, according to our records.

8 A. What do you mean?

9 Q. In that six-month period of

10 time, did you ever check to see what was

11 going on with that one million dollars of

12 people's money that you had taken in?

13 A. To my knowledge, everything was

14 fine, so when people requested money or when

15 people made a request for a withdrawal, I

16 put it through and gave them their

17 withdrawal.

18 Q. How much of that two hundred

19 and twelve thousand dollars did you keep?

20 A. Did I keep?

21 Q. Yes.

22 A. Nothing. Whatever they

23 requested, they got back. The only percent

24 which was kept was the ten percent of the

25 return that CCC has to pay you separately.

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1 That's it.

2 Q. And where did those payments to

3 you go, those separate payments to you?

4 A. They went to the club.

5 Q. Is it your testimony that you

6 got no money, personally, out of Dream

7 Makers Capital Investment?

8 A. Dream Makers Capital Investment

9 received money from CCC whenever you

10 deposited or withdrew.

11 Q. But when you made this 1.1

12 million dollars of deposits, Dream Makers

13 Capital Investment got back money; is that

14 correct?

15 A. Dream Makers got money from the

16 withdrawal request from the client, and

17 then, as I explained to you already, you

18 have ten percent of that from CCC, which is

19 separate and apart. That's not from the

20 request.

21 Q. I understand that.

22 So it's a separate ten percent?

23 A. And that doesn't mean you get

24 it right away.

25 Q. Was the separate ten percent

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1 based on the deposits?

2 A. Deposits and withdrawals. If

3 you get a deposit, it's a deposit. If it's

4 a withdrawal, then it's a withdrawal.

5 Q. So let's start with the

6 deposits.

7 A. Yes, ma'am.

8 Q. The 1.1 million dollars, the

9 other ten percent that you would get with

10 that --

11 A. Ma'am, that's money that was

12 deposited little by little, not like you

13 just described. It's not all at once.

14 Q. It's deposited over a period of

15 time?

16 A. Of course.

17 Q. I understand.

18 That was from March 13th, 2008

19 through September 15th, 2008. I understand

20 that.

21 A. That's right.

22 Q. Follow my question, please,

23 because you've told me that there was ten

24 percent that was sent to Dream Makers

25 Capital, based on all of the deposits and

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1 all of the withdrawals.

2 You just said that to me three

3 times; is that correct?

4 A. Separately, but that doesn't

5 mean that we received them.

6 Q. I understand it was separately.

7 Are you telling me that you

8 received none of the ten percent?

9 A. I didn't say that we received

10 none.

11 Q. How much of it did you receive?

12 A. We were owed some money.

13 Q. "We were owed some money" is

14 not really responsive to my question.

15 My question is: How much did

16 you receive?

17 A. I don't recall, but I have the

18 amounts down as to how much CCC still owes

19 us from either deposits or withdrawals.

20 Q. Did you receive money, Miss

21 Williams?

22 A. My club did, but not me,

23 personally.

24 Q. Did the club receive money,

25 Miss Williams?

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1 A. The club received money on
 2 deposits and withdrawals, whenever it was
 3 requested.
 4 Q. Forget about the withdrawal
 5 requests for a moment, please. Forget about
 6 it.
 7 A. Okay.
 8 Q. Every time that there was a
 9 deposit into the account, ma'am, did you
 10 receive the ten percent?
 11 A. The club received ten percent
 12 sometimes.
 13 Q. What account did you put those
 14 into?
 15 A. The club's account.
 16 Q. And similarly, you put that ten
 17 percent into the Dream Makers Capital South
 18 account, the Georgia account; is that
 19 correct?
 20 A. I'm sorry?
 21 Q. Did you receive ten percent on
 22 the deposits you made in Georgia?
 23 A. Yes, ma'am.
 24 Q. Did you put them into the
 25 account in Georgia?
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1 A. I don't know if it was the
 2 account in Georgia. I can't recall which
 3 account it was, but it was an account for
 4 D.M.C.I.
 5 Q. And you don't know how much
 6 money the club got back; is that right?
 7 A. No, ma'am.
 8 Q. How much money did you,
 9 personally, get, ma'am?
 10 A. I got about twenty thousand
 11 dollars.
 12 Q. And what did you do with that
 13 twenty thousand dollars?
 14 A. What did I do with that?
 15 Q. Yes. What did you do with that
 16 money?
 17 A. I used it for whatever I
 18 needed.
 19 Q. And at no point in time did you
 20 check and see what the status of these
 21 so-called investments with your brother
 22 were; is that correct?
 23 A. We checked.
 24 Q. You did check?
 25 A. Yes, ma'am.
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1 Q. And what did you discover?
 2 A. That there was no problem.
 3 Q. How is it that you determined
 4 there was no problem?
 5 A. Because we were told that there
 6 was nothing.
 7 Q. Who told you that?
 8 A. If we made requests for money,
 9 we would get the money, so what was the
 10 problem?
 11 Q. Did you ever check to see where
 12 the money was invested?
 13 A. No, ma'am.
 14 Q. Why?
 15 A. Because the way the club works
 16 is that you invest the money with CCC and
 17 CCC decides wherever they decide to invest.
 18 They diversify or do whatever they decide to
 19 do with that money, and that's just how it
 20 was. That's how the club operated.
 21 Q. And you never promised any of
 22 your investors statements; is that right?
 23 A. No.
 24 Q. And you never asked for any
 25 statements with regard to the 1.1 million
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1 dollars of investor money that had been
 2 entrusted to you; is that right?
 3 A. No.
 4 Q. So basically, what you're
 5 saying is that CCC controlled all aspects of
 6 the investment of D.M.C.I.'s members; is
 7 that right?
 8 A. Correct.
 9 Q. And D.M.C.I. ceded all of its
 10 control to CCC, in terms of all discretion
 11 on any investment; is that right?
 12 A. Right.
 13 Q. And CCC wasn't even required to
 14 provide a statement or any explanation of
 15 its actions with regard to Dream Makers
 16 money; is that right?
 17 A. Yes, that's right.
 18 Q. Did CCC ever receive a
 19 percentage of the investments that were made
 20 by Dream Makers?
 21 A. The twenty percent, like I told
 22 you before, is ten percent for CCC and ten
 23 percent for the club. That's how it's
 24 always been for every club.
 25 Q. So then the statement that
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<p>1 Creative Capital Consortium never received 2 any form of compensation, including any kind 3 of kickback, from the investment of or from 4 any of the investment members, is not 5 correct on paragraph 14? 6 A. Those are management fees, 7 ma'am. 8 Q. You mean management fees, you 9 don't mean any form of admission; is that 10 right? 11 A. Yes. 12 Q. Would that be another error in 13 your Declaration? 14 A. Those were management fees. 15 Q. Would you agree with me that 16 management fees is a form of compensation, 17 Miss Williams. 18 A. I wouldn't know that, ma'am. 19 Q. Well, would it be more accurate 20 to say that, to your knowledge, neither CCC 21 nor George Theodule ever received any form 22 of compensation, except for the ten percent 23 that they received from all of the deposits, 24 from Dream Maker Capital of any kind, 25 including a kickback of any kind from the FERNANDEZ & ASSOCIATES</p>	<p>1 Q. In other words, it wasn't CCC 2 or Merryl Lynch? 3 A. Actually, they had an option. 4 Q. They did? 5 A. Yes, ma'am. 6 Q. And what was that option? 7 A. If they knew of any other 8 investment opportunity, then they had the 9 option to bring it up to the club, and then 10 we could also check it out by investing with 11 them, but there was no such thing brought 12 up. 13 Q. So my point is that when you 14 were talking to them and getting the money 15 in, the only option that they had was CCC; 16 isn't that correct? 17 A. No. 18 Q. Whether they could have brought 19 in somebody else or not, the only option 20 that you were presenting was CCC; is that 21 right? 22 A. That's correct. 23 Q. You say in here, in paragraph 24 16, that you don't believe that your brother 25 has conducted himself in a manner to defraud FERNANDEZ & ASSOCIATES</p>
Page 59	Page 61
<p>1 club? 2 Would that be a more accurate 3 statement? 4 A. Yes, ma'am. 5 Q. Now, did you tell your members 6 that they were going to be investing in CCC? 7 I'm sorry. 8 Did you tell your members that 9 their investments were going to be placed by 10 CCC? 11 A. What do you mean "placed"? 12 Q. You testified a minute ago that 13 CCC had complete control over all of Dream 14 Maker's investments; is that right? 15 A. All investments are done with 16 CCC, yes. 17 Q. And that they had complete 18 control over them? 19 A. That's correct. 20 Q. You told that to your 21 investors? 22 A. Yes, of course. 23 Q. Did you tell them that there 24 were no other investment options? 25 A. What do you mean by that? FERNANDEZ & ASSOCIATES</p>	<p>1 anyone. 2 Do you see that? 3 A. Yes, ma'am. 4 I don't believe that he 5 intentionally wanted to do anything like 6 that. 7 Q. Paragraph 16 says: As it 8 pertains to Creative Capital Consortium, 9 LLC, I do not believe that George Theodule 10 has conducted himself in a manner designed 11 to intentionally, recklessly or negligently 12 defraud anyone. 13 Do you see that? 14 A. Yes, ma'am. 15 Q. Would your opinion be the same 16 if you knew that he defalcated or stole 17 three million dollars of CCC's money and put 18 it into an Options Express investment 19 account in his name and in the name of 20 another individual or would your opinion 21 change? 22 A. I would need to know the 23 reason. I can't make a comment like that 24 about my brother without knowing why he did 25 that. FERNANDEZ & ASSOCIATES</p>

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1 Q. Assume that he did.
 2 A. I can't assume that.
 3 Q. Assume, for the purposes of my
 4 question, that the evidence is that your
 5 brother took three million dollars of
 6 Creative Capital's money and put it into an
 7 Options Express account in his name and that
 8 of another person.
 9 A. I can't answer that, ma'am.
 10 Q. But that would be okay with
 11 you, if he did that, if he actually stole
 12 the money?
 13 A. No. Stealing is not okay with
 14 me, ma'am.
 15 Q. If he took CCC's money and
 16 moved it to somebody else's account without
 17 their authorization and without their
 18 knowledge, would that be stealing, in your
 19 opinion?
 20 A. Without somebody's knowledge?
 21 Q. And without their
 22 authorization.
 23 Would that be stealing, in your
 24 opinion?
 25 A. That would be wrong.
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1 Q. So if he did that, would your
 2 opinion, as you express it in paragraph 16
 3 of this Declaration, change?
 4 A. Yes, of course.
 5 Q. You say that you have known
 6 George Theodule all your life. You're his
 7 sister. That's in paragraph 17.
 8 Do you see that?
 9 A. Yes.
 10 Q. It's true, is it not, that you
 11 didn't have anything close to regular
 12 communications with your brother; is that
 13 right?
 14 A. Yes.
 15 Q. So you don't really know what
 16 your brother has been up to, do you?
 17 A. No, not all the time.
 18 Q. Do you know what a Ponzi scheme
 19 is?
 20 A. Not really.
 21 Can you explain it to me?
 22 Q. On paragraph 21, how is it that
 23 you can say your brother wasn't engaged in a
 24 Ponzi scheme if you don't know what a Ponzi
 25 scheme is?
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1 A. Because to my knowledge, what
 2 he was doing was not a Ponzi scheme, so this
 3 is why I couldn't tell you that.
 4 Q. Well, a Ponzi scheme is taking
 5 in money from people, promising a return on
 6 their investment, and then paying your
 7 earliest investors with money that comes
 8 from your latest investors.
 9 Do you understand that, ma'am?
 10 A. Yes.
 11 Q. Is that what your brother did?
 12 A. Not that I know of.
 13 Q. Then how is it that there's no
 14 money left to pay Dream Makers the rest of
 15 the money that you owe its investors?
 16 MR. WAX: I will object to the
 17 form of the question that she owes the
 18 investors.
 19 BY MS. VAN VLIET:
 20 Q. "You" being Dream Makers.
 21 Sorry.
 22 How is it that there's no money
 23 left?
 24 A. I don't know what CCC did with
 25 the money when they invested it or how they
 FERNANDEZ & ASSOCIATES

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1 managed it.
 2 Q. As a matter of fact, you don't
 3 even know if they invested it, do you?
 4 A. I don't know.
 5 Q. Let's talk about the rent for
 6 CCC at the building.
 7 MR. WAX: Did you say the rent
 8 for CCC?
 9 MS. VAN VLIET: Yeah.
 10 MR. WAX: I just wanted to make
 11 sure. I understood.
 12 MS. VAN VLIET: No problem.
 13 BY MS. VAN VLIET:
 14 Q. Let's talk about the rent for
 15 CCC.
 16 You had started Yopana as a
 17 personnel servicing agency; is that correct?
 18 A. Yes, ma'am.
 19 Q. And as a matter of fact, you
 20 operated Dream Makers out of the same
 21 address you operated Yopana out of; is that
 22 correct?
 23 A. Yes, but with several offices.
 24 Q. And that's in Coral Springs; is
 25 that correct, on University Drive?
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1 A. Yes, ma'am.
 2 Q. And Carmen Tejada also has her
 3 offices there; is that right?
 4 A. Right.
 5 Q. And she was the accountant, for
 6 some period of time, for CCC and some of the
 7 investment clubs; is that right?
 8 A. Yes.
 9 Q. As a matter of fact, she's your
 10 tenant in the property that you purchased,
 11 the condo property that you purchased, with
 12 CCC money that George gave to you; is that
 13 correct?
 14 A. Yes, ma'am.
 15 Q. By the way, has she still been
 16 paying you rent?
 17 A. Yes, ma'am.
 18 Q. And you've been receiving those
 19 monies?
 20 A. Paying the association. That's
 21 all.
 22 Q. Is that all you've been doing
 23 with that money?
 24 A. Yes, ma'am.
 25 Q. There's no money left, apart
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1 from what you pay the association?
 2 A. Well, that's how I pay my
 3 bills.
 4 Q. So you pay your own personal
 5 bills with the rent money, too?
 6 A. Yes, what's left of it.
 7 ---
 8 (Thereupon, a Copy of a Check was
 9 marked as Defendant's Exhibit Number
 10 YW-4 for Identification.
 11 ---
 12 BY MS. VAN VLIET:
 13 Q. For the record, I'm now handing
 14 you what's been marked as Exhibit Number
 15 YW-4.
 16 Would you take a look at that
 17 for me, please?
 18 A. Yes, ma'am.
 19 Q. That's the Yopana check that
 20 you paid the rent with for the CCC offices;
 21 is that correct?
 22 A. Yes, ma'am.
 23 Q. Tell me how it came to be that
 24 you paid the rent out of the Yopana account.
 25 A. It was requested of me.
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1 Q. It was requested of you by
 2 whom, ma'am?
 3 A. Mr. Theodule.
 4 Q. Your brother asked you to do
 5 it, right?
 6 A. Yes, ma'am.
 7 Q. And why is it that he couldn't
 8 pay CCC's rent out of his own accounts?
 9 A. I don't know that.
 10 Q. Did he explain to you why he
 11 needed you to pay CCC's rent?
 12 A. Because he had some money for
 13 the payroll for the employees that were
 14 working for me, and so that money came out
 15 of that.
 16 Q. And did he explain to you that
 17 the reason you had to pay the rent out of
 18 Yopana's payroll expenses for CCC and
 19 otherwise was because banks were closing all
 20 of his accounts because of his suspicious
 21 activities?
 22 A. No, he did not.
 23 Q. Did you also make payments out
 24 of your personal account?
 25 A. Yes, I did.
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1 MR. WAX: Wait a minute,
 2 please.
 3 MS. VAN VLIET: Sure.
 4 MR. WAX: Can I have a private
 5 conversation with you, Theresa?
 6 MS. VAN VLIET: With me?
 7 MR. WAX: With you, yes.
 8 MS. VAN VLIET: Let's go off
 9 the record, please.
 10 Let's take a short break.
 11 ---
 12 (Thereupon, a brief break was had,
 13 after which time the following
 14 transpired:)
 15 ---
 16 MS. VAN VLIET: Let's go back
 17 on the record, please.
 18 BY MS. VAN VLIET:
 19 Q. Let me ask the question again,
 20 Miss Williams.
 21 A. Yes, ma'am.
 22 Q. Miss Williams, we talked about
 23 the monies that you paid for and on behalf
 24 of CCC through Yopana; is that correct?
 25 A. Yes, ma'am.
 FERNANDEZ & ASSOCIATES

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<p>1 Q. Do you recall those questions?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. I want to move now to monies</p> <p>4 that you pay on behalf of CCC through your</p> <p>5 own personal account.</p> <p>6 Do you recall doing that?</p> <p>7 A. I hereby invoke my Fifth</p> <p>8 Amendment right against self-incrimination.</p> <p>9 Q. Who instructed you to do that?</p> <p>10 A. I hereby invoke my Fifth</p> <p>11 Amendment right against self-incrimination.</p> <p>12 Q. Did your brother tell you that</p> <p>13 he couldn't pay those amounts of money?</p> <p>14 Why did your brother tell you</p> <p>15 to do that?</p> <p>16 A. I hereby invoke my Fifth</p> <p>17 Amendment right against self-incrimination.</p> <p>18 Q. The last time we met, there</p> <p>19 were a series of corporations that I had</p> <p>20 asked you about that had been in your</p> <p>21 brother's financial statement that you said</p> <p>22 you didn't know anything about, and then we</p> <p>23 started to go through the Florida Department</p> <p>24 of Corporation records or the Sunbiz</p> <p>25 records.</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 an Order to Show Cause and includes, at the</p> <p>2 very back, in the last four pages, an</p> <p>3 exhibit C, which is a supplemental financial</p> <p>4 statement.</p> <p>5 Do you see that?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. On the first page, it lists</p> <p>8 your brother's assets.</p> <p>9 By the way, when was the last</p> <p>10 time you were up in your brother's house or</p> <p>11 the house in Loganville, Georgia?</p> <p>12 A. I've never been.</p> <p>13 Q. Are you familiar with your</p> <p>14 brother's purchase of any classic hot rod</p> <p>15 muscle cars?</p> <p>16 A. No, ma'am.</p> <p>17 Q. What do you know about this</p> <p>18 alleged burglary that took place in</p> <p>19 Loganville, Georgia in or about January of</p> <p>20 2009?</p> <p>21 A. Just what I told you guys the</p> <p>22 last time that I was here, which is that I</p> <p>23 had heard that computers and bedroom</p> <p>24 comforters and things like that had been</p> <p>25 stolen.</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>
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<p>1 Do you remember that?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Do you recall the questions</p> <p>4 from your brother's affidavit or do I need</p> <p>5 to go through those again with you?</p> <p>6 MR. WAX: The question was from</p> <p>7 her brother's affidavit?</p> <p>8 Is that what you said, Theresa?</p> <p>9 MS. VAN VLIET: Yeah. We went</p> <p>10 through the accounting from her</p> <p>11 brother previously.</p> <p>12 MR. WAX: Well, you're going to</p> <p>13 have to go through that again.</p> <p>14 MS. VAN VLIET: No problem.</p> <p>15 - - -</p> <p>16 (Thereupon, a Response to Order</p> <p>17 Granting Plaintiff's Application for</p> <p>18 Order to Show Cause was marked as</p> <p>19 Defendant's Exhibit Number YW-5 for</p> <p>20 Identification.</p> <p>21 - - -</p> <p>22 BY MS. VAN VLIET:</p> <p>23 Q. Let me show you now what I've</p> <p>24 now marked as Exhibit Number YW-5, which is</p> <p>25 your brother's response to a Motion granting</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 Q. Okay.</p> <p>2 A. I really don't know very much</p> <p>3 about what happened there.</p> <p>4 Q. Who is Marie Jean Baptiste?</p> <p>5 A. She's a personal friend of the</p> <p>6 family's.</p> <p>7 Q. Is she a friend of yours?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Why did your brother loan her</p> <p>10 one hundred thousand dollars of CCC money,</p> <p>11 do you know?</p> <p>12 A. I don't know that.</p> <p>13 Q. Well, look at your brother's</p> <p>14 statement, page 2 of 4, which is listed</p> <p>15 under the CCC Investments and/or assets.</p> <p>16 Do you see that?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Can you read that?</p> <p>19 A. I read that.</p> <p>20 Q. Do you know anything about</p> <p>21 that?</p> <p>22 A. I don't know why he did that.</p> <p>23 Q. Do you know when was the last</p> <p>24 time you talked to Mary Jean Baptiste?</p> <p>25 A. I haven't spoken to her since</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>

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<p>1 last year at the wedding. 2 Q. What do you know about 3 Earlyviews, Inc.? 4 A. That's Kathy's business. 5 Q. Kathy, the same person that 6 helped you? 7 A. Yes, ma'am. 8 Q. As a matter of fact, she used 9 to work at WAMU, didn't she? 10 A. Yes. 11 Q. She was one of the individuals 12 that your brother and other CCC people would 13 see when you went to the bank; isn't that 14 correct? 15 A. I don't know that. 16 Q. You would come in there with 17 bags of cash to deposit? 18 A. I wouldn't know that. 19 Q. Did you ever talk to her about 20 that? 21 A. No. 22 Q. What is Earlyviews, Inc.? 23 A. That's her business. 24 Q. Do you know what she does? 25 A. I think it's photography, I FERNANDEZ & ASSOCIATES</p>	<p>1 A. I don't know what that is. 2 Q. What about General Insurance 3 Agency? 4 A. I don't know. 5 Q. The address is 8461 Lake Worth 6 Road. 7 Are you familiar with that 8 address? 9 A. Yes. 10 Q. That's the same address as CCC, 11 isn't it? 12 A. I don't know that. That 13 doesn't mean that I know who General 14 Insurance Agency is, though. 15 Q. Is that the same address as 16 CCC? 17 A. Yes, ma'am. 18 Q. Who is Mike Nascarella? 19 A. That's Indira's husband, 20 because they have the same last name. 21 Q. Did Indira work for CCC? 22 A. Yes. 23 Q. What did she do? 24 A. I don't know. 25 Q. Well, apparently, you knew more FERNANDEZ & ASSOCIATES</p>
Page 75	Page 77
<p>1 believe. I'm not even sure. 2 Q. What is Caribbean Airways? 3 A. I don't know. It's an airline, 4 I believe. 5 Q. What is Elite Luxury Travel? 6 A. That's the travel company. 7 That was the travel company of Clyde 8 Richardson. 9 Q. Who is Clyde Richardson? 10 A. I met him only once or twice. 11 Q. Who is he, though? 12 A. He was supposed to be the one 13 running this business. 14 Q. Where did you meet him? 15 A. When I was in Georgia, I 16 believe. He came to hear one of my Georgia 17 friends speak that was doing a seminar or 18 whatever. 19 Q. How about Sky King? 20 Do you know what that is? 21 A. I don't know anything about 22 that company. 23 Q. What is Haiti Development? 24 A. What is it? 25 Q. Haiti Development? FERNANDEZ & ASSOCIATES</p>	<p>1 than that she was his wife. You knew that 2 she worked for CCC, as well. 3 A. Yes, ma'am. 4 Q. Did you ever see her working on 5 computers? 6 A. I don't remember. 7 Q. Did she handle any money? 8 A. I don't know. 9 Q. What did she do? 10 What did you see her do? 11 A. She worked in the office. 12 That's what I saw. 13 Q. Where in the office did she 14 work? 15 A. In the main office. 16 Q. In the main office with 17 computers? 18 A. Yeah. 19 Q. Do you know what she did with 20 the computers? 21 A. I don't know. 22 Q. The Mannah Group, what is that? 23 A. I don't know. I heard about 24 it, but I don't know. 25 Q. What did you hear about it? FERNANDEZ & ASSOCIATES</p>

<p style="text-align: right;">Page 78</p> <p>1 A. I just heard about the Mannah 2 Group and that they were putting it 3 together, but I don't know anything else 4 about it. 5 Q. What did you hear about the 6 Mannah Group, other than that they were 7 putting together? 8 A. I don't know. 9 Q. Who did you hear it from? 10 A. I don't recall. 11 Q. Was it your brother? 12 A. I don't recall. 13 Q. When was the last time you 14 talked to your sister-in-law? 15 A. About the same time as I talked 16 to my brother. 17 Q. What's Divine Alliance? 18 A. I never could understand what 19 this was, honestly. I couldn't even explain 20 it to you. 21 Q. Why don't you start with 22 telling me when you first heard about it? 23 A. I don't recall exactly. 24 Q. Who first talked to you about 25 Divine Alliance? FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. Well, that's what your brother 2 is saying in his accounting. 3 A. I don't know anything about 4 that. 5 Q. Well, assume for me that it's 6 true. 7 A. Okay. 8 Q. You were involved with Divine 9 Alliance, in terms of having been approached 10 at the beginning by Ronald Virgil; is that 11 correct? 12 A. That's correct. 13 Q. Who was Ronald Virgil in 14 relation to CCC? 15 What did he do? 16 A. I thought he had a club. 17 That's how I knew of Ronald Virgil. That's 18 all I knew. 19 Q. And is Eve Theodule your 20 brother? 21 A. That's my cousin. 22 Q. Do you have any recollection of 23 what your involvement in this was supposed 24 to be? 25 A. No. If you put these things to FERNANDEZ & ASSOCIATES</p>
<p style="text-align: right;">Page 79</p> <p>1 A. Virgil. 2 Q. Who is Virgil? 3 A. I only knew him as Virgil. I 4 don't know the last name or anything. 5 Q. Is this a company that you were 6 involved in with Mark Rene? 7 A. I think he might have asked 8 Mike Rene and me to work together, but that 9 never happened. 10 Q. What were you supposed to work 11 together on? 12 A. I still don't understand it. I 13 can't even explain it, because I don't 14 understand it. 15 Q. Well, don't worry about 16 explaining it. Just tell me what you 17 remember, please. 18 A. That's the thing. Honestly, I 19 can't even explain it to you, because I 20 don't know. 21 Q. Well, Divine Alliance got ten 22 thousand dollars of CCC's money. 23 Did you know that? 24 A. I don't know anything about 25 that. FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 81</p> <p>1 me, then I can look at them and maybe 2 recall, but I can't recall at this time. 3 Q. What is BeatHouse.com? 4 A. I don't know. I'm reading that 5 here, as well. It's BeatHouse.com. I see 6 that. 7 Q. Don't just read it to me. 8 Do you know what BeatHouse.com 9 is? 10 A. No. I just read it on here. 11 Q. Did you ever have any knowledge 12 of a business that was under development 13 with Mario Theodule up in West Palm Beach? 14 A. I don't know anything about any 15 of their businesses. 16 Q. Who is Mario Theodule? 17 A. My brother. 18 Q. Who is Jeff Jackson, do you 19 know? 20 A. I don't know. 21 Q. Who is Stacey Fortunat? 22 A. I believe I met her through 23 Marie Jean Baptiste. I believe that they 24 had worked together in the past. That's all 25 I know. FERNANDEZ & ASSOCIATES</p>

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<p>1 Q. And she apparently purchased 2 some homes. 3 A. I don't now about that. 4 Q. Do you know what Unity 5 Entertainment was? 6 A. No, ma'am. 7 Q. Do you know who Rony Devarenes 8 is? 9 A. No. 10 Q. Do you have any information 11 about payments to individuals in Sierra 12 Leone for hotel development? 13 A. No. 14 Q. Specifically, do you have any 15 information about payments to politicians in 16 Sierra Leone to facilitate the quote/unquote 17 hotel developments? 18 A. No, ma'am. 19 Q. Omega MC, Incorporated, are you 20 familiar with that? 21 A. No, ma'am. 22 Q. Who is Joel Deeb? 23 A. I don't know, ma'am. 24 Q. Have you ever heard the name 25 Deeb before? FERNANDEZ & ASSOCIATES</p>	<p>1 BY MS. VAN VLIET: 2 Q. I'm sorry? 3 A. We would have to compare your 4 numbers with our numbers. I don't actually 5 know. 6 Q. How much money do you still 7 have in Yopana? 8 A. A little over five thousand 9 dollars. 10 Q. What is Good Buy Homes, Inc.? 11 A. I don't know. 12 --- 13 (Thereupon, Corporation Documents 14 were marked as Defendant's Exhibit 15 Number YW-6 for Identification. 16 --- 17 BY MS. VAN VLIET: 18 Q. Let me hand you what's been 19 marked as Exhibit Number YW-6. That's 20 Sunbiz records for Good Buy Homes, Inc. 21 Would you take a look at that 22 for me, please? 23 A. Yes, ma'am. 24 Q. You are listed as the 25 registered agent and the vice-president. FERNANDEZ & ASSOCIATES</p>
Page 83	Page 85
<p>1 A. No, ma'am. 2 Q. Krissy McKeon, do you know her? 3 A. She worked for my brother. 4 Q. At CCC; isn't that right? 5 A. Yes, ma'am. 6 Q. Did she also use to work at 7 WAMU? 8 A. I don't know if she worked at 9 WAMU. I know that she was a friend of 10 Kathy's. 11 Q. In addition to the twenty 12 thousand dollars that you got from Dream 13 Makers, you also got twenty-eight thousand 14 dollars of CCC money, according to your 15 brother, for management fees out of Yopana; 16 is that correct? 17 MR. WAX: How much was that 18 again? 19 MS. VAN VLIET: Twenty-eight 20 thousand dollars. 21 MR. WAX: You can answer the 22 question. 23 THE WITNESS: I don't know 24 about that. I would have to check the 25 numbers again. FERNANDEZ & ASSOCIATES</p>	<p>1 Do you see that on there? 2 A. Yes, ma'am. 3 Q. Tell me what this is. 4 A. It's a corporation. 5 Q. Are you saying that you had no 6 knowledge that Miss Alexis put you on this 7 corporation? 8 A. I don't know any of the details 9 of it. 10 Q. Well, do you know anything 11 about it at all? 12 A. No. 13 Q. Have you ever talked to Donna 14 Haver? 15 A. I don't think so. 16 Q. Have you ever heard the name 17 Good Buy Homes before today? 18 A. Yes. 19 Q. Apart from discussions you may 20 have had with your lawyer regarding it, tell 21 me everything you've discussed with anyone, 22 whatsoever, about Good Buy Homes. 23 A. I don't know anything, so I 24 couldn't discuss anything with anybody. 25 Q. Well, you just told me that FERNANDEZ & ASSOCIATES</p>

Page 86	Page 88
<p>1 you've heard about it before today; isn't 2 that correct? 3 A. I've heard about it because of 4 the corporation. That's the extent of it, 5 ma'am. He just put my name on there. 6 That's it. I don't know anything else about 7 it at all. 8 Q. Who told you they were going to 9 put your name on it? 10 A. Gabrielle. 11 Q. When did Gabrielle tell you 12 that she was going to put your name on this 13 corporation? 14 A. I don't recall exactly when 15 that was. 16 Q. Was it before or after you 17 opened Dream Makers? 18 A. I don't recall when it was. 19 Q. Did she tell you why she was 20 going to put your name on it? 21 A. I don't recall. 22 Q. Did she ask for your permission 23 to put your name on it? 24 A. Yes, she did. 25 Q. Did you receive anything in FERNANDEZ & ASSOCIATES</p>	<p>1 A. Yes, ma'am. 2 Q. By the way, that principal 3 address on University Drive, is that the 4 same address that you were operating Yopana 5 and Dream Makers out of? 6 A. I had many offices there, 7 ma'am. 8 Q. My question is this: The 9 address that is printed on these documents 10 is 1500 North University Drive, suite 273. 11 Coral Springs, Florida. 33071. 12 Now, is that the same address 13 that you were operating Dream Makers and 14 Yopana out of? 15 A. Is that their address? 16 MR. WAX: That's a yes or no 17 question. Just answer it yes or no, 18 please, Miss Williams. 19 THE WITNESS: There's a typo in 20 there. 21 BY MS. VAN VLIET: 22 Q. What's the typo? 23 A. The suite number is not 273. 24 That's incorrect. 25 Q. It's not suite 273? FERNANDEZ & ASSOCIATES</p>
Page 87	Page 89
<p>1 return for accepting the responsibility of 2 being the registered agent and the 3 vice-president of this corporation? 4 A. No, ma'am. 5 Q. G-Trade Capital Advisors, LLC, 6 what is that? 7 A. I don't know. 8 Q. When was the first time you 9 heard of G-Trade Capital Advisors, LLC? 10 A. I don't know. 11 Q. Was the first person you heard 12 of G-Trade Capital Advisors, LLC from 13 Gabrielle Alexis? 14 A. I truly don't remember. 15 --- 16 (Thereupon, Corporation Documents 17 were marked as Defendant's Exhibit 18 Number YW-7 for Identification. 19 --- 20 BY MS. VAN VLIET: 21 Q. For the record, I'm handing you 22 Exhibit YW-7, which is Sunbiz records for 23 G-Trade Capital Advisors, LLC. 24 Would you take a look at that 25 for me, please? FERNANDEZ & ASSOCIATES</p>	<p>1 A. No. 2 Q. What is it? 3 A. It's 253. 4 Q. You were the registered agent 5 and the manager of G-Trade Capital Advisors, 6 LLC; is that correct? 7 A. Yes. 8 Q. What was the purpose of this 9 corporation that you formed or that was 10 formed in your name? 11 A. I'm trying to remember. I'm 12 sorry. Bear with me, please. I'm trying to 13 recall. 14 Q. Take your time. 15 A. I can't recall. 16 MR. WAX: Do you want to talk 17 to me? 18 THE WITNESS: I can't recall. 19 MR. WAX: Is there something 20 you want to explain to me as to why 21 you can't recall? 22 THE WITNESS: I don't know. 23 Yes, maybe. I'm sorry. 24 MR. WAX: Let's go outside and 25 talk for a minute, please. FERNANDEZ & ASSOCIATES</p>

<p style="text-align: right;">Page 90</p> <p>1 Let's take a short break, 2 Theresa. She needs to talk to me 3 about something. We won't be very 4 long at all. 5 Excuse us, please. 6 MS. VAN VLIET: No problem. 7 Let's take a break, please. 8 --- 9 (Thereupon, a brief break was had, 10 after which time the following 11 transpired:) 12 --- 13 MS. VAN VLIET: Let's go back 14 on the record, please. 15 BY MS. VAN VLIET: 16 Q. The last one we were 17 discussing, I believe, was G-Trade Capital 18 Advisors, LLC. 19 Did you have an opportunity to 20 review those documents after speaking with 21 your attorney, Miss Williams? 22 A. Yes, ma'am. 23 Q. And do all of your answers with 24 regard to that corporation still stand? 25 A. Yes, ma'am. FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 92</p> <p>1 tell you. 2 MR. WAX: Just answer the 3 question, please. 4 If you don't know, you don't 5 know. 6 THE WITNESS: I don't know. 7 --- 8 (Thereupon, Corporate Documents 9 were marked as Defendant's Exhibit 10 Number YW-9 for Identification. 11 --- 12 BY MS. VAN VLIET: 13 Q. I will now show you what we've 14 marked as Exhibit Number YW-9. 15 Would you take a look at that 16 for me, please? 17 A. Yes, ma'am. 18 Q. Do you recall a company by the 19 name of Le Verbe, Inc., L-E V-E-R-B-E? 20 A. I believe that's a corporation, 21 ma'am. 22 Q. The company is a corporation? 23 A. I believe so, yes. 24 Q. Do you recall anything else 25 about it? FERNANDEZ & ASSOCIATES</p>
<p style="text-align: right;">Page 91</p> <p>1 --- 2 (Thereupon, Corporation Documents 3 were marked as Defendant's Exhibit 4 Number YW-8 for Identification. 5 --- 6 BY MS. VAN VLIET: 7 Q. I'm now handing you what I've 8 marked as YW-8, ma'am. 9 Would you take a look at that 10 for me, please? 11 A. Yes, ma'am. 12 Q. For the record, these are the 13 corporate documents with regard to a 14 business called G-Trade Capital Management, 15 LLC. 16 What is your recollection with 17 regard to this company? 18 A. I don't know. 19 Q. You don't know what this is? 20 A. No, ma'am. 21 Q. You are the registered agent 22 and the manager of this one, as well. 23 Did you view the exhibit that I 24 just handed you? 25 A. Yes, but I don't know what to FERNANDEZ & ASSOCIATES</p>	<p style="text-align: right;">Page 93</p> <p>1 You got me on that one. 2 A. I'm sorry, but that's all I 3 know. 4 Q. Your brother is the president 5 of this one and you're the registered agent 6 and the vice-president. 7 Do you see that there? 8 A. Yes, ma'am. 9 Q. Do you recall ever discussing 10 this business with him? 11 A. No, ma'am. 12 Q. Turning your attention to the 13 last page on this document, please, unlike 14 the other ones, there's actually copies of 15 documents purporting to bear your signature 16 here. 17 Do you see that? 18 A. Yes, ma'am. 19 Q. Are those your signatures? 20 A. Yes, ma'am. 21 Q. Does this refresh your 22 recollection at all about this particular 23 business? 24 A. That's from Gabrielle. 25 Q. What do you mean? FERNANDEZ & ASSOCIATES</p>

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1 Gabrielle Alexis gave this to
 2 you?
 3 A. Yes, ma'am.
 4 Q. Would she often give you
 5 documents to sign?
 6 A. No, ma'am. Those are the only
 7 two things that I really recall having
 8 received from her.
 9 - - -
 10 (Thereupon, Corporation Documents
 11 were marked as Defendant's Exhibit
 12 Number YW-10 for Identification.
 13 - - -
 14 BY MS. VAN VLIET:
 15 Q. I show you what has now been
 16 marked as Exhibit Number YW-10.
 17 Would you take a look at that
 18 for me, please?
 19 A. Yes, ma'am.
 20 Q. This is now the corporate
 21 documents for a company called Electronic
 22 Capital Solutions, Inc.
 23 Would you take a look at that
 24 for me, please?
 25 A. Yes, ma'am.
 FERNANDEZ & ASSOCIATES

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1 Q. Do you remember that one?
 2 A. Yes, ma'am.
 3 Q. What was it?
 4 A. That was a corporation that was
 5 opened and we just never did anything with
 6 it.
 7 Q. What was the intent of opening
 8 it?
 9 A. It was about electronic
 10 solutions.
 11 Q. I pretty much got that, because
 12 the title of it is Electronic Capital
 13 Solutions.
 14 Can you tell me what the
 15 electronic solutions were in a little more
 16 detail, please?
 17 A. We never really developed the
 18 business.
 19 Q. Who is Marie Alexandre?
 20 A. That's my brother's
 21 ex-girlfriend.
 22 Q. And was she a personal friend
 23 of yours, as well?
 24 A. No, ma'am. I just met her
 25 through my brother.
 FERNANDEZ & ASSOCIATES

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1 Q. Why did he give Marie Alexandre
 2 four hundred thousand dollars of CCC's
 3 money?
 4 A. I don't know that.
 5 Q. I'm sorry?
 6 A. I don't know that. I read it
 7 in here, but I don't know why he did it.
 8 That's all I can say.
 9 Q. Did it have anything to do with
 10 starting up this Electronic Capital
 11 Solutions, Inc.?
 12 A. Not that I know of.
 13 Q. Who is Jacquelin Cherizard?
 14 A. He was one of the people that
 15 was put on the corporation.
 16 Q. I know that.
 17 Do you know her, independently
 18 of the corporation?
 19 A. Yes, ma'am.
 20 Q. And when did you meet her?
 21 MR. WAX: Him.
 22 MS. VAN VLIET: I'm sorry.
 23 BY MS. VAN VLIET:
 24 Q. When did you meet him?
 25 A. We've known each other since I
 FERNANDEZ & ASSOCIATES

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1 was working in Pahokee.
 2 Q. You met him in Pahokee?
 3 A. Yes, ma'am.
 4 Q. How did you meet him in
 5 Pahokee?
 6 A. He would come to the store.
 7 Q. And did you strike up a
 8 friendship with him?
 9 A. Yes, ma'am.
 10 Q. What did he do for a living?
 11 A. I'm sorry. I can't think of
 12 the name.
 13 MR. WAX: Was he a baker, a
 14 candlestick maker, a policeman?
 15 THE WITNESS: He worked helping
 16 with AIDS patients and with the
 17 C.D.C., I think.
 18 BY MS. VAN VLIET:
 19 Q. Let me see if I can refresh
 20 your recollection a little bit.
 21 Wasn't he also a manager of
 22 Dream Makers?
 23 A. Yes, ma'am.
 24 Q. And what were his abilities and
 25 qualifications with regard to investments,
 FERNANDEZ & ASSOCIATES

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<p>1 if any?</p> <p>2 A. I don't know.</p> <p>3 Q. Did he have any prior</p> <p>4 experience in this line of work?</p> <p>5 A. No, ma'am.</p> <p>6 Q. For that matter, did you?</p> <p>7 A. No, ma'am. None of us did.</p> <p>8 Q. And whose idea was this</p> <p>9 Electronic Capital Solutions, Inc.?</p> <p>10 A. I don't know.</p> <p>11 Q. He's the president.</p> <p>12 Was it his idea?</p> <p>13 A. I don't know. I was invited to</p> <p>14 be a part of this. I don't know whose idea</p> <p>15 it started out with.</p> <p>16 Q. Who invited you?</p> <p>17 A. Jacquelin.</p> <p>18 Q. And when he invited you, what</p> <p>19 did he say?</p> <p>20 A. He wanted to see if I would be</p> <p>21 interested in doing Electronic Capital</p> <p>22 Solutions, Inc., which we never really</p> <p>23 developed.</p> <p>24 Q. Let's do it this way.</p> <p>25 Tell me everything that he or</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 develop that concept.</p> <p>2 Q. It was going to be Internet</p> <p>3 sales of electronics; is that right?</p> <p>4 A. Yes.</p> <p>5 Q. And were you supposed to be</p> <p>6 putting in Dream Maker's money in there or</p> <p>7 what?</p> <p>8 A. No, no, no. Dream Makers had</p> <p>9 nothing to do with it.</p> <p>10 Q. So it wasn't an investment</p> <p>11 option for Dream Makers?</p> <p>12 A. No, ma'am.</p> <p>13 Q. Was this something you came up</p> <p>14 with on your own, you and Cherizard and</p> <p>15 Marie Alexandre, or was your brother at all</p> <p>16 involved in this?</p> <p>17 A. I don't think my brother was</p> <p>18 involved in it. That's something that</p> <p>19 Mr. Cherizard and Marie had already started</p> <p>20 up or thought about. They had already been</p> <p>21 discussing it.</p> <p>22 Q. I think we've already talked</p> <p>23 about Dolce Regency, but in addition to what</p> <p>24 we've already talked about, in terms of you</p> <p>25 being there when there was the initial</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>
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<p>1 anyone else said to you about Electronic</p> <p>2 Capital Solutions, except for your lawyer.</p> <p>3 A. Electronic Capital Solutions</p> <p>4 was supposed to be an electronic company.</p> <p>5 Q. I think we all got that.</p> <p>6 Do you know what this company</p> <p>7 supposedly did?</p> <p>8 A. I think the idea was like you</p> <p>9 go on the Internet and you would be able to</p> <p>10 purchase electronics through Electronic</p> <p>11 Capital Solutions. It never really</p> <p>12 developed, and so I don't know all the</p> <p>13 details.</p> <p>14 Q. Well, it never developed and</p> <p>15 there were discussions about starting it are</p> <p>16 two different things. I recognize that it</p> <p>17 never developed.</p> <p>18 A. That's all I know, though.</p> <p>19 Q. What did the company do?</p> <p>20 A. Like I said, it's like you go</p> <p>21 on the Internet and if you want to buy</p> <p>22 something, you buy it from them.</p> <p>23 For example, if you go to Best</p> <p>24 Buy, you can click on this and you purchase</p> <p>25 it. That was the whole idea of trying to</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>	<p>1 walk-through, do you know anything else</p> <p>2 about that transaction?</p> <p>3 A. No, I don't.</p> <p>4 MS. VAN VLIET: I don't believe</p> <p>5 that I have anything else.</p> <p>6 Thank you, Miss Williams.</p> <p>7 THE WITNESS: You're welcome.</p> <p>8 MR. WAX: Yolette, I just want</p> <p>9 to ask you a couple of questions here.</p> <p>10 CROSS-EXAMINATION</p> <p>11 BY MR. WAX:</p> <p>12 Q. Very briefly, Miss Williams, I</p> <p>13 want to ask you about exhibit YW-2, the</p> <p>14 Declaration of Yolette T. Williams.</p> <p>15 A. Yes, sir.</p> <p>16 Q. Who presented this Declaration</p> <p>17 to you?</p> <p>18 A. Mr. Weigel.</p> <p>19 Q. When Mr. Weigel presented this</p> <p>20 Declaration to you, was this Declaration</p> <p>21 already typed up?</p> <p>22 A. I believe so, yes.</p> <p>23 Q. We he presented it to you,</p> <p>24 where were you?</p> <p>25 A. I was in his office.</p> <p style="text-align: center;">FERNANDEZ & ASSOCIATES</p>

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1 Q. Did Mr. Weigel know, when he
 2 presented this to you, that you were
 3 represented by counsel?
 4 A. Yes, he did.
 5 Q. Did you tell him that I was
 6 your lawyer?
 7 A. Yes, I did.
 8 Q. Did you tell him that you
 9 wanted to discuss this with me?
 10 A. I don't recall that.
 11 Q. Did you discuss this with me
 12 before you signed it?
 13 A. No, sir.
 14 Q. When Mr. Weigel asked you to
 15 sign this document, did he tell you why you
 16 were signing this document?
 17 A. It was about D.M.C.I. That's
 18 all I knew.
 19 Q. Did he tell you that he was
 20 representing D.M.C.I.?
 21 A. No, but I told him that I was
 22 not -- that I didn't have no representation
 23 for D.M.C.I.
 24 Q. Did you sign this as Yolette
 25 Williams, managing member of D.M.C.I., or
 FERNANDEZ & ASSOCIATES

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1 did you sign this as Yolette Williams,
 2 individually?
 3 MS. VAN VLIET: We'll stipulate
 4 that she signed it individually,
 5 Barry.
 6 MR. WAX: Thank you very much.
 7 BY MR. WAX:
 8 Q. Did Mr. Weigel tell you what he
 9 was going to do with the Declaration after
 10 you signed it?
 11 A. He was going to file it.
 12 Q. Did you know where he was going
 13 to file it?
 14 A. I don't recall.
 15 Q. Did you know on whose behalf he
 16 was going to file it?
 17 A. I believe he was going to file
 18 it on behalf of my brother.
 19 MR. WAX: I have nothing
 20 further.
 21 Thank you very much, Miss
 22 Williams.
 23 THE WITNESS: You're welcome.
 24 MS. VAN VLIET: I have no
 25 further questions.
 FERNANDEZ & ASSOCIATES

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1 Thank you very much, ma'am.
 2 THE WITNESS: You're welcome.
 3 MS. VAN VLIET: Rachel, Brad,
 4 do you have anything?
 5 MS. PAULOSE: I have no
 6 questions.
 7 Thank you very much.
 8 MS. VAN VLIET: Brad's not even
 9 there, I don't think.
 10 We're done.
 11 MR. WAX: She reads.
 12 Thank you very much.
 13 (Thereupon, the deposition was
 14 concluded.)
 15
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 24
 25
 FERNANDEZ & ASSOCIATES

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1
 2 CERTIFICATE OF OATH
 3
 4 COUNTY OF MIAMI-DADE)
 5 THE STATE OF FLORIDA)
 6 I, the undersigned authority,
 7 certify that YOLETTE T. WILLIAMS personally
 8 appeared before me and was duly sworn on the
 9 21st day of April, 2009.
 10 Dated this 1st day of
 11 May, 2009.
 12
 13
 14
 15
 16
 17
 18
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 20
 21
 22
 23
 24
 25
 FERNANDEZ & ASSOCIATES

1 COUNTY OF MIAMI-DADE)
 2 STATE OF FLORIDA)
 3 CERTIFICATE
 4 I, ELLIE ADELSTEIN, Registered
 5 Professional Reporter and Notary Public in
 6 and for the State of Florida at Large, do
 7 hereby certify that I was authorized to and
 8 did report in stenotype the deposition of
 9 YOLETTE T. WILLIAMS, a witness called in the
 10 above-styled cause; that the reading and
 11 signing of the deposition were not waived by
 12 the witness; and that the foregoing pages,
 13 numbered from 1 to 106, inclusive,
 14 constitute a true and complete record of my
 15 stenographic notes.
 16 I further certify that I am not
 17 a relative, employee, attorney or counsel of
 18 any of the parties, nor am I a relative or
 19 employee of any of the parties' attorneys or
 20 counsel connected with the action, nor
 21 financially interested in the action.
 22 Dated this 1st 15th, 2009.
 23
 24 _____
 ELLIE ADELSTEIN, R.P.R.
 Court Reporter
 25
 FERNANDEZ & ASSOCIATES

1 FERNANDEZ & ASSOCIATES
 2 444 Brickell Avenue
 Suite 718
 Miami, Florida 33131
 3 Ph: (305) 374-8868
 4 May 1st, 2009
 5
 6 To: Yolette T. Williams
 c/o Barry Wax, Esq.
 Law Offices of Barry Wax
 7 777 Brickell Avenue
 Suite 1210
 8 Miami, Florida 33131
 9 Re: SEC v. CCC, et al.
 Deposition of: Yolette T. Williams
 10 Taken: April 21st, 2009
 Number of Pages: 105
 11 Available for Reading: May 21st, 2009
 12 Dear Ms. Williams,
 13 This is to advise you that the
 transcript of your deposition is completed
 14 and is available at this time for your
 reading and signing.
 15 Please arrange to conclude this
 matter at your earliest convenience. We
 16 would suggest that you telephone this office
 and arrange an appointment suitable for all
 17 concerned, or you may arrange to receive a
 copy of your transcript from any of the
 18 attorneys on the case.
 However, if the reading and
 19 signing has not been concluded prior to the
 above-referenced date, I shall then proceed
 20 to file the original of said transcript with
 the party who took the deposition, without
 21 further notice to any parties.
 Your prompt attention to this
 22 matter is appreciated.
 23 Sincerely,
 24 _____
 Ellie Adelstein, R.P.R.
 Court Reporter
 25 FERNANDEZ & ASSOCIATES