

UNITED STATES SECURITIES AND EXCHANGE COMMISSION vs. JOHN E. BRINKER, JR.
SANDRA G. HARBOTTLE
September 14, 2001

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES AND:
EXCHANGE COMMISSION,

Plaintiff

-v-

JOHN E. BRINKER, JR., et al.,

Defendants

:

:

Case No. IP 01-0259-C-H/G
(Judge Hamilton)

:

:

:

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The deposition of SANDRA G. HARBOTTLE, taken before Melea E. Chaney, Court Reporter and Notary Public in and for the State of Ohio, at the law offices of Ulmer & Berne, 600 Vine Street, Suite 2800, Cincinnati, Ohio, on the 14th day of September, 2001, beginning at the hour of 12:55 p.m. and ending at the hour of 4:35 p.m. of the same date.

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APPEARANCES:

FOR THE RECEIVER: JACQUELINE SCHUSTER HOBBS, Esq.
 Attorney at Law
 600 Vine Street
 Suite 2800
 Cincinnati, Ohio 45202
 - 0 -

STIPULATIONS:

It is stipulated by and between counsel for the respective parties that the deposition of SANDRA G. HARBOTTLE, a witness herein, may be taken at this time pursuant to the Federal Rules of Civil Procedure and Notice; that the deposition may be taken via Stenomask by the Notary Public/Court Reporter, and transcribed by her out of the presence of witness; that the deposition was submitted to the witness for reading and signature.

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1 SANDRA G. HARBOTTLE, called as a witness, being first
 2 duly sworn, testified as follows:
 3 MS. HOBBS: Good afternoon, Ms.
 4 Harbottle.
 5 THE WITNESS: Hi.
 6 MS. HOBBS: I'm Jackie Hobbs. I'm
 7 going to be taking your deposition today in the
 8 SEC case versus John Brinker, et al.
 9 Before we get started, have you ever
 10 had your deposition taken before?
 11 THE WITNESS: One time for a car
 12 accident I was in, we did a small deposition.
 13 MS. HOBBS: And was that your
 14 deposition?
 15 THE WITNESS: Mm-hmm. Yeah.
 16 MS. HOBBS: When was that?
 17 THE WITNESS: Oh, gosh. Probably about
 18 six years ago.
 19 MS. HOBBS: Okay. Well, just to sort
 20 of give you some guidelines, if you need to
 21 take a break at any time, just let me know, a
 22 restroom break or a break. As long as there's
 23 no question pending, I'm happy to give you a
 24 break. Depending on how long we go, I might
 25 just say let's take a break, a five, ten-minute

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1 break.
 2 THE WITNESS: Okay.
 3 MS. HOBBS: If you don't understand my
 4 question, ask me. I'm not here to ask you
 5 trick questions. I want you to understand my
 6 questions and --
 7 THE WITNESS: Okay.
 8 MS. HOBBS: -- give me answers. If you
 9 do answer my questions, I'm going to assume
 10 that you understood the questions and --
 11 THE WITNESS: Okay.
 12 MS. HOBBS: -- have answered
 13 accordingly. I think that's it. I'm going to
 14 start with some background information, get
 15 from you your name, address, things like that.
 16 THE WITNESS: Okay.
 17 BY MS. HOBBS:
 18 Q Why don't you state for me your full
 19 name and spell your last?
 20 A Sandra G. Harbottle,
 21 H-A-R-B-O-T-T-L-E.
 22 Q Do you go by Sandy?
 23 A Yeah.
 24 Q Sandy, how old are you?
 25 A Thirty-eight.

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1 Q And what is your date of birth?
2 A January 17th, 1963.
3 Q Are you married?
4 A Yes.
5 Q What is your husband's name?
6 A John.
7 Q Do you have children?
8 A One child.
9 Q Are they a minor?
10 A She's 16.
11 Q What is her name?
12 A Alisha, A-L-I-S-H-A.
13 Q Okay. Why don't you tell me about your
14 educational background starting with high school
15 obviously?
16 A Okay. I went to Williamsburg High
17 School.
18 Q Where is that?
19 A Williamsburg, Ohio. And --
20 Q When did you graduate?
21 A 1980. And I went to Betz Business
22 College for one year.
23 Q Is that B-E-T-T-S?
24 A B-E-T-Z. And I went to Clermont
25 College for one year.

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1 Q Let's start with Betz Business College.
2 When did you go there?
3 A Oh, goodness. Let's see. That was
4 probably in 1981.
5 Q So 1981 to '82?
6 A Yeah.
7 Q And what did you study there?
8 A Just general courses, filing, typing,
9 accounting, just things like that.
10 Q Business-related classes?
11 A Yeah.
12 Q And then you said you went to Clermont
13 College for one year. When would that have been?
14 A That would have been from like '82 to
15 '83.
16 Q And what did you study at Clermont
17 College?
18 A Computers, data entry, psychology, more
19 accounting, English, that type of thing.
20 Q And did you get a degree or a
21 certificate of any kind --
22 A No. No.
23 Q -- from either Betz --
24 A No.
25 Q -- or Clermont? Other than the

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1 education that you've told me about, any other higher
2 education?
3 A No.
4 Q Okay. What is your current address,
5 Sandy?
6 A [REDACTED]
7 [REDACTED]
8 Q What is your zip?
9 A [REDACTED]
10 Q Is that a house?
11 A Yes.
12 Q Do you own or rent?
13 A We own it.
14 Q When did you buy that?
15 A Either 1986 late or early 1987.
16 Q Do you remember the purchase price?
17 A \$50,000.
18 Q Is there currently a mortgage on the
19 property?
20 A Yes.
21 Q How much is that approximately? I'm
22 not asking you to the penny.
23 A Oh, goodness. Let's see. We probably
24 still owe about \$35,000 on it.
25 Q What are your monthly payments?

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1 A \$249.
2 Q What company holds that mortgage?
3 A Farmer's Home.
4 Q Is that located here in Cincinnati?
5 A I believe it might be in Pittsburgh.
6 Q Only one mortgage on your home?
7 A Yes.
8 Q Did Gary Bentz or John Brinker ever
9 make any mortgage payments on your home?
10 A No.
11 Q Did any of the other defendants to this
12 litigation ever make any mortgage payments on your
13 home?
14 A No.
15 MS. HOBBS: One more thing. To go back
16 to our guidelines, one thing we have to be
17 careful of is not to speak over each other.
18 Sometimes it's just human nature --
19 THE WITNESS: Okay.
20 MS. HOBBS: -- to want to answer, but
21 unfortunately Melea can't take us both down or
22 it's very difficult when we're both talking.
23 I'll try to let you finish your answer. I did
24 forget to mention that.
25 The other thing I would mention is that

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1 Melea can't take down nods of the head or
2 huh-uh or uh-huh, so you have to answer yes or
3 no. Sorry for not --
4 THE WITNESS: Okay.
5 MS. HOBBS: -- bringing that up
6 earlier.
7 BY MS. HOBBS:
8 Q Has anyone besides you and your husband
9 ever made mortgage payments on this house?
10 A No.
11 Q Did Gary Bentz or John Brinker ever pay
12 for any improvements to your home?
13 A No.
14 Q What about the other defendants to this
15 litigation?
16 A No.
17 Q Anyone besides you and your husband pay
18 for any improvements to your home?
19 A No.
20 Q I'm going to ask you some questions,
21 Sandy, about your employment history. What is your
22 occupation?
23 A I'm unemployed right now.
24 Q When you were employed, what was your
25 occupation?

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1 A I worked for Castlerock Consulting.
2 Q That was the last place that you
3 worked?
4 A Yes.
5 Q What was your title there?
6 A I was the secretary for Gary Bentz.
7 Q How long did you work at Castlerock?
8 A Actually it goes back. I worked for
9 John before Castlerock even came into existence.
10 Q Tell me about that.
11 A He was working for Prepaid Legal and I
12 was the secretary for John then.
13 Q And where were you working out of,
14 Sandy?
15 A Out of John's home.
16 Q And where was that home at that time?
17 A On [REDACTED] in
18 Cincinnati, Ohio.
19 Q [REDACTED] Do you know the exact
20 address?
21 A I don't remember it.
22 Q Do you know what side of town -- is
23 that on the [REDACTED] side?
24 A Yeah. It's right around the [REDACTED]
25 area.

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1 Q I haven't heard of that one before.
2 I'm from the west side myself, but I know some of the
3 bigger streets on the east side. And when you worked
4 for John, did you work as a secretary for him?
5 A Yes.
6 Q How long did you do that for?
7 A I worked on and off for John starting
8 -- goodness. Let's see. Probably for six or seven
9 years between -- between working for only him and then
10 through the Castlerock time, so probably around 1994,
11 '95, something in that area.
12 Q Up through?
13 A Till Castlerock closed in 2000. Well,
14 December 2000 was when we got our last paycheck, but I
15 stayed --
16 Q From Castlerock?
17 A Yeah. But I stayed for a few months
18 longer, a couple months longer.
19 Q Did you get paid?
20 A No. No.
21 Q Going back to when you worked for John
22 Brinker while he was doing Prepaid Legal and you were
23 his secretary at [REDACTED], you said you did that
24 for about six years before Castlerock was formed?
25 A No. It was during the whole period,

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1 the whole time.
2 Q So how long would you say you worked
3 for John Brinker doing Prepaid Legal as his Prepaid
4 Legal --
5 A On and off probably for about three
6 years.
7 Q So maybe from around '94, '95 to '97,
8 '98?
9 A Yeah. Yes, that's correct.
10 Q You said your last job was working for
11 Castlerock Consulting --
12 A Yes.
13 Q -- as Gary Bentz's assistant --
14 A Yes.
15 Q -- or his secretary. How long did you
16 do that?
17 A I actually started -- John and Gary got
18 together and I started working for -- that's when I
19 started working not only for John doing the Prepaid
20 Legal, but also for the both of them together. In late
21 1997 I believe it was.
22 Q You began working for Castlerock?
23 A Yes.
24 Q Was that when Castlerock was formed?
25 A Well, no it wasn't. No. That -- then

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1 it was Wellington.
 2 Q The company was called Wellington?
 3 A Yes.
 4 Q Wellington Capital Holdings?
 5 A Yes.
 6 Q And where were the offices located?
 7 A That was in John Brinker's home and
 8 that was on [REDACTED]
 9 Q [REDACTED]?
 10 A Yes.
 11 Q So he and Mr. Bentz were working out of
 12 his home doing Wellington Capital Holdings?
 13 A Yes.
 14 Q Okay. Let me step back. I'll ask you
 15 more questions in detail about Wellington, but I'm just
 16 getting an employment history from you right now.
 17 When you did Prepaid Legal, what
 18 exactly was Mr. Brinker doing as far as Prepaid Legal
 19 was concerned?
 20 A He was selling Prepaid Legal. And he
 21 was a little higher up than just your average person
 22 who was selling it, so he would do meetings. He had a
 23 lot of legwork with it. He had people underneath him
 24 that worked for him, so I was kind of like a secretary
 25 for that.

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1 Q Tell me, who worked for him?
 2 A Well, just myself in the office, but
 3 there was people underneath him who he had recruited to
 4 do some of the selling, so -- there was so --
 5 Q Who would that be?
 6 A There was so many.
 7 Q Any names come to mind, Sandy? Michael
 8 Drew?
 9 A His wife, Kimberly, Kimberly Drew.
 10 Q Anybody else come to mind?
 11 A Oh, goodness. There was just so many.
 12 I can't even think of the names. Can I possibly come
 13 back to that after I think --
 14 Q Absolutely. Yes. If you think of any
 15 at any time, just stop me and say "I've remembered some
 16 more."
 17 A There was so many of them that I didn't
 18 deal with, you know, but they were recruited underneath
 19 him, so --
 20 Q Was he sort of in a manager-type
 21 position?
 22 A A regional manager.
 23 Q So instead of doing more of the
 24 selling, he had people he had recruited who did the
 25 actual selling for him?

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1 A Right.
 2 Q Is that how it worked?
 3 A Well, yes, it worked that way too, but
 4 he also did the selling too. It was something that you
 5 had to build in -- in order to make more money. You
 6 know, the -- the bigger you built it, the more you made
 7 and the higher position you got. So he -- he did the
 8 selling too, but he recruited a lot of people also,
 9 gave a lot of meetings and --
 10 Q What happened at those meetings?
 11 A I actually only attended one of the
 12 meetings. They would just get together and discuss any
 13 new things that were happening, different ideas how to
 14 recruit, just that type of thing.
 15 Q And were these meetings with the people
 16 he had recruited or --
 17 A Yes, and sometimes they would bring
 18 people with them to listen to the meetings or just --
 19 Q Other people --
 20 A Yes.
 21 Q -- they wanted to recruit?
 22 A Yes.
 23 Q Okay. I'll work my way back here, but
 24 let's go back to talking about Wellington Capital
 25 Holdings. You have testified that it was formed in

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1 1997.
 2 A Yeah. Right -- right around 1997.
 3 Q What was your salary when you first
 4 started working for Wellington in '97?
 5 A When I first started working, it was \$5
 6 an hour.
 7 Q How many hours would you work, Sandy?
 8 A It -- it really just depended and it
 9 was just on -- whenever he needed me. Sometimes it was
 10 more than others, so it kind of varied.
 11 Q And what exactly did you do?
 12 A Just secretarial work, filing, copying,
 13 phone calls, that type of thing.
 14 Q As far as phone calls were concerned,
 15 what did those usually entail?
 16 A I'd just answer the phone when people
 17 called in, took messages.
 18 Q What kind of people would call in when
 19 you were working for Wellington in '97?
 20 A It was still like John's Prepaid
 21 business, so it was a mixture of both. Sometimes
 22 clients would call in.
 23 Q Investors?
 24 A Yes. Well, before they were investors
 25 it was people that would call in, but would want to

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1 talk to Gary to come out and talk to them. You know,
2 they would call in and say, you know, "Hey, I heard of
3 this product and I'd like to speak to someone about it"
4 or whatever. So I would just take messages like that.
5 Q So these were potential investors?
6 A Yes.
7 Q Did your salary increase at some point
8 when you were still working for Wellington?
9 A Yes. It went up to \$6.50 probably
10 after I was there about a year.
11 Q How long did you work for Wellington?
12 A I worked for Wellington until they --
13 it took over -- till Castlerock took over for them.
14 And I can't exactly remember when that was.
15 Q Would that have been in maybe '99?
16 A Yeah. I'm -- I'm not really sure when
17 it -- it went from Wellington to Castlerock, so -- I
18 worked through the time.
19 Q When you say Castlerock took over for
20 them, tell me what you mean by that, Sandy.
21 A Just the name change.
22 Q So Castlerock was continuing the
23 business of Wellington Capital Holdings?
24 A Actually, no. It was -- it was like a
25 consulting company for Wellington. And I'm not sure

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1 exactly how all that worked out.
2 Q So Wellington still existed?
3 A Yes.
4 Q It didn't go out of existence?
5 A No.
6 Q What kind of consulting work did
7 Castlerock do for Wellington Capital Holdings?
8 A Dealt with some of the clients when
9 they would call in.
10 Q When you say clients, do you mean
11 investors?
12 A Investors. I'm sorry. Also --
13 Q Did you consider Castlerock Consulting
14 to be a mail facilitator?
15 A We did handle some mail for the
16 investors.
17 Q And when you say handled mail for
18 investors, what do you mean by that?
19 A Sometimes they would mail things to us
20 instead of mailing it directly to Grenada. Sometimes
21 Grenada would mail things to us and we would have to
22 forward it on to the investors.
23 Q When you say Grenada, are you talking
24 about Wellington Capital Holdings?
25 A Yes. Yes. I'm sorry.

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1 Q What kind of things would Wellington
2 Capital Holdings mail to Castlerock for mailing to
3 investors?
4 A I can't really say for sure because
5 whenever it came, it was sealed up.
6 Q You never saw what was in the
7 envelopes?
8 A No, not always.
9 Q But sometimes you did?
10 A It -- it always came sealed.
11 Everything was sealed and packaged.
12 Q Did the things that you received, the
13 mailings from Wellington Capital Holdings, did those
14 come through the United States Postal Service?
15 A I believe it was Airborne.
16 Q I take it Castlerock would turn around
17 and mail these things to the investors that they had
18 received from Wellington, correct?
19 A Yes.
20 Q And would the United States Postal
21 Service be used to mail those things?
22 A It was still Airborne, still
23 overnighted or second day.
24 Q Never by United States Postal Service?
25 A You know, I really -- I really can't

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1 say for sure. I know we did a lot of Airborne stuff
2 because that way we could track things. Through the
3 postal office you really couldn't track things like
4 that, so -- I know they did mail out Christmas cards
5 and stuff like that through the mail, but --
6 Q Castlerock did?
7 A Well, Wellington did, you know, but --
8 Q Castlerock on behalf of Wellington?
9 A They would -- Wellington would send it
10 in bulk to us and then we took it to the post office.
11 But Christmas cards and like that probably through the
12 mail, but mostly everything went through Airborne.
13 Q Did Wellington Capital Holdings have a
14 postage meter in its office?
15 A Yes.
16 Q Did I say Wellington or --
17 A I believe you did.
18 Q I'm sorry.
19 A Castlerock.
20 Q Did Castlerock Consulting have a
21 postage meter in its office?
22 A Yes.
23 Q Did your salary increase when you began
24 working for Castlerock Consulting?
25 A Yes. After a while it did.

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1 Q What did it increase to, Sandy?
 2 A My first increase I was getting \$900
 3 every two weeks. I don't know how to total that by the
 4 year.
 5 Q So \$1800 a month?
 6 A Yes.
 7 Q I take it you got a second increase?
 8 A Yes. The last increase I got only
 9 twice and it went up to \$1500 every two weeks. And I
 10 only got that two times at the very end.
 11 Q Would that have been in early fall of
 12 2000 that you got that raise?
 13 A Yes.
 14 Q Okay. Besides being a consulting
 15 company to Wellington Capital Holdings and mailing
 16 things that it received from Wellington Capital
 17 Holdings, what else did Castlerock Consulting do?
 18 A I can't say for sure what all it did.
 19 I -- you know, I know what I did. I do know that --
 20 that we did deal with some of the clients -- or
 21 investors when they called in, any problems they would
 22 have. Sometimes they would have address changes or
 23 different things like that and sometimes they didn't
 24 want to call Grenada because of the cost of the phone
 25 bill, so they would call us. I guess just dealing with

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1 the investors.
 2 Q On behalf of Wellington Capital
 3 Holdings?
 4 A Correct.
 5 Q Can you tell me who else worked for
 6 Castlerock Consulting while you worked there?
 7 A Do you want to know in the beginning
 8 and at the end or --
 9 Q Yes. Anybody who worked there while
 10 you worked there, Sandy.
 11 A Okay.
 12 Q You can just tell me when they worked
 13 there and what they did.
 14 A Okay. When we first started out, it
 15 was just John and Gary and myself. And then after, I'm
 16 not quite sure, I'm going to say a few months, Julie
 17 Brinker came to work for us, that's John's daughter.
 18 And that's basically -- she took over everything.
 19 That's basically when I just became Gary's secretary
 20 only. And it was like that for quite awhile. And then
 21 Julie went to Grenada and ran the office in Grenada.
 22 And then --
 23 Q Wellington Capital Holdings she ran?
 24 A Yes. Yes. Then Steve Stewart was
 25 hired and Jennifer Myers. And I -- I think Steve

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1 Stewart might have been first, but I can't -- I can't
 2 swear to that, but they were the next two.
 3 Q What did Steve Stewart do?
 4 A Steve -- I'm not really sure what he
 5 ever did. I know at one point he was working for
 6 Emerald Gate which was another company that they were
 7 running -- that John was running. And I didn't really
 8 know anything about that, but he became in charge of
 9 that.
 10 Then Matt Powers was hired. And then
 11 Kelly Crouch, that's John Brinker's daughter,
 12 stepdaughter. Let's see. Stacy Kepf, K-E-P-F, that's
 13 John Brinker's niece, she was hired. And Brian Miller,
 14 he was hired. And we had a receptionist, her name was
 15 Heather Rose. And Don Quales.
 16 Q Anybody else you can think of, Sandy?
 17 A And Russ Latham. He was hired at the
 18 very end.
 19 Q I'm just going to go back and ask you
 20 what some of these people did. You testified that
 21 Julie Brinker came and took over handling Castlerock
 22 Consulting after you had been there a short while,
 23 correct?
 24 A Yes.
 25 Q What did she do?

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1 A She -- any checks that would come in,
 2 she would collect the checks.
 3 Q Checks from investors?
 4 A Yes. And check the paperwork that was
 5 also sent in with the check. She would make sure that
 6 the copies to all that got to Grenada. She did all the
 7 computer work, spreadsheets, that type of thing.
 8 Q What kind of spreadsheets would she do,
 9 Sandy?
 10 A Just keeping track of the -- the
 11 investors and dates and the money and, you know, that
 12 type of thing. Bank accounts I guess.
 13 Q Was there a database that she created
 14 or someone at Castlerock --
 15 A Yes.
 16 Q -- created --
 17 A Yes.
 18 Q -- that had lists of investors and how
 19 much they invested?
 20 A Yes.
 21 Q Whose computer was that on?
 22 A I would assume Julie's. She had her
 23 own computer.
 24 Q Did she have a laptop?
 25 A Yes, she did at one point.

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1 Q Did Julie create these investor lists?
 2 A Yes, in the very beginning she did.
 3 Q Did I hear you correctly that she had a
 4 laptop?
 5 A Yes, she did at one point.
 6 Q Do you know what program she used,
 7 Sandy, to create the investor list and how much was
 8 invested?
 9 A No, I don't. I thought -- I believe
 10 she worked in Excel quite a bit.
 11 Q Have we talked now about everything
 12 that Julie Brinker did for Castlerock while she was
 13 there?
 14 A Yes. Well, at the end she went to Las
 15 Vegas and was running an office in Las Vegas.
 16 Q When you say at the end, are you
 17 talking about fall of 2000?
 18 A Before -- before -- yeah, before the
 19 company closed.
 20 Q So fall of 2000 she goes to Las Vegas?
 21 A Well, I believe it was before the fall.
 22 I can't really remember exact -- when she came back
 23 from Grenada, Felicia Gardner -- I'm sorry, I didn't
 24 add her name to that list.
 25 Q She's an employee of Castlerock?

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1 A Yeah. It's coming back.
 2 Q That's okay.
 3 A And also Eric. And I can't remember
 4 his last name right now.
 5 Q Webber?
 6 A Webber. That's John's nephew. He
 7 worked in Grenada with Felicia. But there was a point
 8 where Felicia was sent to Grenada to --
 9 Q Is it Felicia?
 10 A Yes.
 11 Q Okay. Sorry.
 12 A -- to learn from Julie how to run the
 13 office there and then Julie came -- came back and she
 14 went to Las Vegas and set up an office there.
 15 Q All these people that we're talking
 16 about that you've said were employees of Castlerock, it
 17 sounds like they performed services for the other
 18 defendant companies in this litigation; is that
 19 correct? I'm hearing from you that they're Castlerock
 20 employees, but, for instance, Felicia Gardner went and
 21 was running Wellington Capital Holdings.
 22 A When -- when Felicia came, she came to
 23 work for Castlerock Consulting. And she was only here
 24 a short while before John had asked her if she would go
 25 take over Julie's place and work there. So when --

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1 when Felicia went to Grenada, she then ran Wellington
 2 -- or was in charge of the office there.
 3 Q Wellington Capital Holdings?
 4 A Yeah.
 5 Q Sort of an office manager?
 6 A Yes. Yes.
 7 Q Was she still receiving her paycheck
 8 from Castlerock though?
 9 A That I don't know.
 10 Q Let's go back to talking about Julieann
 11 Brinker. Did she go by Julieann or Julie?
 12 A Julieann.
 13 Q Okay. So we were talking sometime in
 14 2000 Julie goes to Las Vegas.
 15 A Correct.
 16 Q And what did she do out there?
 17 A I never knew anything about what
 18 happened in Las Vegas. Gary and I didn't do -- deal
 19 with -- we didn't deal with the -- the people that was
 20 running that or weren't informed of anything that was
 21 happening there.
 22 Q Do you know, was there a specific
 23 company she went there to run?
 24 A Alpha Advantage.
 25 Q What did Alpha Advantage do?

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1 A I honestly don't know.
 2 Q Who created that company?
 3 A John Brinker and I believe he had a
 4 couple other guys that he might have started that
 5 business with, but I don't know their names.
 6 Q Do you know what kind of business Alpha
 7 Advantage was in?
 8 A No, I'm sorry, I don't.
 9 Q You don't know what it did or who its
 10 employees were?
 11 A No clue.
 12 Q You don't know where it got its money
 13 or how it made its money?
 14 A No, I don't.
 15 Q Do you know who the owners of the
 16 company were?
 17 A No, I don't.
 18 Q John Brinker I'm assuming?
 19 A Yeah. Yes. I don't know who was with
 20 him or -- I don't know anything about that one.
 21 Q Have we talked about everything that
 22 Julieann did for Castlerock and the other defendant
 23 companies? Did she come back from Las Vegas and do
 24 something else?
 25 A Yeah. Well, she came back -- when she

