

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

UNITED STATES SECURITIES AND :  
EXCHANGE COMMISSION,

Plaintiff :

-v- :

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

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

Defendants :

- 0 -

The deposition of JENNIFER L. MYERS, taken before Melea Eilene 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 22nd day of June, 2001, beginning at the hour of 11:57 a.m. and ending at the hour of 5:55 p.m. of the same date.

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UNITED STATES SECURITIES AND EXCHANGE COMMISSION vs. JOHN E. BRINKER, JR.

JENNIFER L. MYERS

June 22, 2001

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APPEARANCES:

FOR THE RECEIVER: BRETT R. FLEITZ, Esq.
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FOR THE DEPONENT: KIMBERLY S. AMRINE, Esq.
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STIPULATIONS:

It is stipulated by and between counsel for the respective parties that the deposition of JENNIFER L. MYERS, a witness herein, may be taken at this time pursuant to the Ohio 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 made available to counsel for the witness for reading and signature.

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1 JENNIFER L. MYERS, called as a witness, being first
2 duly sworn, testified as follows:
3 BY MR. FLEITZ:
4 Q Please state your name for the record.
5 A Jennifer Lynn Myers.
6 Q Is there an E at the end of Lynn?
7 A No, sir. Just L-Y-N-N.
8 Q And how do you spell Myers?
9 A M-Y-E-R-S.
10 Q Where do you reside?
11 A Currently I reside [REDACTED]
12 [REDACTED]
13 Q How long have you lived there?
14 A Since [REDACTED] the [REDACTED] of this year.
15 Q Is your social security number [REDACTED]?
16 [REDACTED]
17 A Yes, sir.
18 Q Have you ever had your deposition taken
19 before?
20 A Never in my life, sir.
21 MR. FLEITZ: I'm sure your counsel has
22 generally described the process for you, but
23 I'm going to do so myself.
24 THE WITNESS: Thank you.
25 MR. FLEITZ: This is an interrogation

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1 under oath. There is a lawsuit pending in
2 Indianapolis in Federal District Court and your
3 statement is being taken in connection with
4 that case.
5 THE WITNESS: Okay.
6 MR. FLEITZ: I'm here to try to uncover
7 facts --
8 THE WITNESS: Mm-hmm.
9 MR. FLEITZ: -- what happened, who,
10 where, what, things of that nature.
11 THE WITNESS: Okay.
12 MR. FLEITZ: I'm going to try to be
13 concise and direct with my questions.
14 THE WITNESS: Okay.
15 MR. FLEITZ: I'm not here to try to
16 confuse or trick your or intimidate you in any
17 fashion.
18 THE WITNESS: Okay. Thank you.
19 MR. FLEITZ: If you don't understand a
20 question, please ask me to rephrase it. I'll
21 be happy to accommodate you.
22 THE WITNESS: Okay.
23 MR. FLEITZ: If you can't hear a
24 question, let me know and I'll speak up.
25 THE WITNESS: Okay.

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1 MR. FLEITZ: If you need a break at any  
2 point, please let me know and we'll be happy to  
3 do that.  
4 THE WITNESS: Okay.  
5 MR. FLEITZ: The only thing I would ask  
6 would be that you not ask for a break while  
7 there's a question pending to you.  
8 THE WITNESS: Sure. Okay.  
9 MR. FLEITZ: I think the final bit of  
10 advice I would give you that would help all of  
11 us and make for a clear record would be answer  
12 with yeses and nos rather than a shake of the  
13 head because it won't be picked by the court  
14 reporter --  
15 THE WITNESS: Okay.  
16 MR. FLEITZ: -- in the transcript.  
17 THE WITNESS: Okay.  
18 MR. FLEITZ: Fair?  
19 THE WITNESS: Very fair. Thank you.  
20 BY MR. FLEITZ:  
21 Q Have you seen a copy of the complaint  
22 filed in this lawsuit?  
23 A I believe that I have, yes, sir.  
24 Q Do you recall where you saw that or  
25 when?

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1 A Oh, boy. I know it was one of two  
2 places and I'm not sure. I probably seen it in both  
3 places, but that --  
4 Q That's fine. Just tell me what you --  
5 A Okay. I've seen it at John's  
6 residence, John Brinker's residence, [REDACTED], and  
7 the second place that I've seen it is an office that he  
8 has in Mason and I think it's [REDACTED].  
9 [REDACTED].  
10 Q I'm sorry. Could you repeat that zip  
11 code again?  
12 A Sure. [REDACTED].  
13 Q Does Mr. Brinker presently maintain  
14 that office in Mason?  
15 A What do you mean by presently maintain?  
16 I'm sorry.  
17 Q Is he current on his lease obligations  
18 there?  
19 A Yes. Yes. He rents there, yes.  
20 Q I would like to hand you what I will  
21 have marked as Exhibit A. This is the subpoena for  
22 your appearance at deposition today.  
23 A Okay.  
24 Q Have you see that before?  
25 A Yes, sir.

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1 Q Did your bring any documents responsive  
2 to the document request on page two of the subpoena?  
3 A Yes, sir. I have some documents that  
4 I've given to my attorney and she brought them with  
5 her.  
6 MR. FLEITZ: Very good. Let's go off  
7 the record for a moment.  
8 (OFF THE RECORD)  
9 MR. FLEITZ: For the record, counsel  
10 for Ms. Myers just produced a folder of  
11 documents reflecting a real property in which  
12 Ms. Myers I believe has an interest. Those are  
13 being copied and we'll revisit that issue later  
14 in the deposition.  
15 BY MR. FLEITZ:  
16 Q Apart from the records in the file  
17 which you just produced to me --  
18 A Mm-hmm.  
19 Q Do you have any other documents  
20 reflecting any gifts or loans to you by any defendant  
21 in this case?  
22 A Gifts or loans as in money or property  
23 in the \$5000 --  
24 Q Correct. As described in the subpoena.  
25 A I don't have any other documents.

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1 Q Have you received any gifts or loans  
2 exceeding \$5000 that aren't evidenced by a document?  
3 A No, sir, I have not.  
4 Q Do you own the home in which you  
5 presently reside, the [REDACTED] address?  
6 A No, sir. That's parent's home and they  
7 own it. I have another piece of property that I do  
8 own.  
9 Q Where is that other piece of property?  
10 A It's [REDACTED].  
11 [REDACTED]  
12 Q Is that a condominium?  
13 A It is a condominium and I lived there I  
14 think for two years, so back from February of -- I -- I  
15 think I moved there in '98. I believe I moved there in  
16 '98.  
17 Q And you lived there until February of  
18 2001?  
19 A Yes, sir. Or not '98. It would be '99  
20 for two years. I forgot this is 2001.  
21 Q Is there a renter in that unit  
22 presently?  
23 A Yes, sir, there is.  
24 Q Who is the renter?  
25 A It's a couple, [REDACTED].

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1 [REDACTED]  
2 [REDACTED] I believe [REDACTED] is the prime tenant.  
3 They plan to get married and eventually live there  
4 together.  
5 Q What is the amount of monthly rent they  
6 pay?  
7 A They pay \$600 a month in lease payment.  
8 Q To whom do they pay that?  
9 A They pay that to me directly.  
10 Q To you personally?  
11 A Mm-hmm. And I make the mortgage  
12 payment and the homeowner's association payment.  
13 Q What is the mortgage payment?  
14 A The mortgage payment is \$377.10.  
15 Q And the homeowner's association  
16 assessment?  
17 A \$110.35 I believe.  
18 Q What was the source of money used to  
19 acquire the [REDACTED] property?  
20 A The source of money used to acquire the  
21 [REDACTED] property?  
22 Q Yes.  
23 A I worked for ARAMARK Uniform Services  
24 for six years. I had a 401K plan, profit sharing. I  
25 believe when I left there I had almost \$8000.

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1 Q In the 401K?  
2 A In the 401K. I rolled it over into a  
3 fixed annuity IRA. And when I decided to buy the  
4 property, I cashed out I think almost exactly \$4000 and  
5 used that for -- to get an FHA loan.  
6 Q Is the mortgage lender?  
7 A Bank United I believe they just changed  
8 hands though and I think it's being -- they're being  
9 bought by a company called Washington something,  
10 Washington -- I don't recall. I'm sorry.  
11 Q So you only have the one mortgage on  
12 that property?  
13 A Only one mortgage on that property,  
14 yes, sir. And it's -- it -- it was \$46,000 I think.  
15 Q Did any of the defendants in this case  
16 make any mortgage payments?  
17 A No, sir.  
18 Q Not at any point?  
19 A Not one. Not -- not at any point.  
20 Q Did they make any payments for  
21 improvements to that property?  
22 A No, sir.  
23 Q Are [REDACTED] or [REDACTED]  
24 related to any of the defendants in this case?  
25 A Not at all, sir.

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1 Q How did you meet them?  
2 A I knew [REDACTED] from church. Probably  
3 back in '98 we went to New Life Worship Center in  
4 Springboro, Ohio. It's now called Clearcreek Christian  
5 Assembly. And she and [REDACTED] were actually not even  
6 dating at that time, but as the years went by, their  
7 dating. She works at Cincinnati -- Cincinnati  
8 Financial and it's just up the street from the  
9 condominium on [REDACTED], so she thought it would be  
10 ideal.  
11 Q Are you presently employed?  
12 A No, sir, I am not.  
13 Q Where did you last work?  
14 A When did I last work for money?  
15 Q That's correct.  
16 A Okay. December of 2000.  
17 Q Are you drawing any form of  
18 unemployment or disability compensation?  
19 A Yes, sir, I am.  
20 Q Unemployment compensation?  
21 A Mm-hmm.  
22 Q From the state of Ohio?  
23 A Yes, sir.  
24 Q Is that relative to your employment  
25 with of the defendants in this case?

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13

1 A You mean does the money come from --  
2 Q It comes from the state, but relative  
3 to which --  
4 A Yes, sir. Yes, sir.  
5 Q -- prior employer?  
6 A Castle Rock Consulting.  
7 Q When would you expect those benefits to  
8 cease?  
9 A I believe in August.  
10 Q Have you been looking for other  
11 employment?  
12 A Yes, sir, I have.  
13 Q I take it that hasn't been successful  
14 thus far?  
15 A Not at all.  
16 Q What are you seeking to do?  
17 A Same as I'm doing -- or was doing,  
18 administrative assistant, executive secretary.  
19 Q So you're not presently working for Mr.  
20 Brinker I take it?  
21 A I'm volunteering time for Mr. Brinker  
22 in the process of looking for a job.  
23 Q He's not paying you anything for that?  
24 A Not at all, sir. Not a penny, he  
25 doesn't have one.

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1 Q Why are you volunteering your time for  
2 Mr. Brinker?  
3 A Mr. Brinker is a good friend of mine.  
4 He's been like a mentor, like a father. I have a  
5 father, but he's been like a second father. I guess  
6 because we have been friends and I like to help my  
7 friends in any way that I can.  
8 Q How much time in the average week would  
9 you say you work for Mr. Brinker?  
10 A Four to five hours per day and I would  
11 say 20 to 25 hours per week. We go to the same church  
12 also, so I see him on Sundays as well.  
13 Q What is Mr. Brinker doing at the  
14 Central Park office in connection with your assisting  
15 him?  
16 A Mostly maintenance. All of his bills  
17 and things that he has to pay eventually, cars,  
18 properties, gas, electric, current ones and old ones, I  
19 basically just keep spreadsheets for him so that he  
20 knows how much he owes each of his creditors.  
21 Q So your capacity as a volunteer for him  
22 is to maintain some control --  
23 A His debt.  
24 Q -- over the creditor/debtor issues that  
25 he faces?

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1 A Exactly. Yes, sir.  
2 Q Does he have any employment for pay?  
3 A No, sir.  
4 Q Does he receive any commissions from  
5 Prepaid Legal?  
6 A I know that he used to. I don't know  
7 that he still does because I don't think he's still an  
8 active associate with that marketing group. I do know  
9 that he receives compensation from a previous group  
10 that he was with, WRL or WMA, World Marketing Alliance,  
11 WMA.  
12 Q What do they do; do you know?  
13 A Not really. I think they either sold  
14 insurance or -- or stocks. I'm not sure.  
15 Q Do you know where they're located?  
16 A WMA?  
17 Q Yes.  
18 A No, I'm sorry, I don't.  
19 Q Do you have any source of income apart  
20 from the unemployment compensation?  
21 A Yes, sir. I consider income the rental  
22 property, the \$600 that I get from [REDACTED] and [REDACTED]  
23 [REDACTED] and then the tenants at 3344 Woodford Road, I  
24 have \$1000 a month rental payment.  
25 Q We'll come back to that in a moment.

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1 Thank you. So is it your testimony that Mr. Brinker  
2 presently is not employed?  
3 A Yes, sir, it is.  
4 Q Where did you go to high school?  
5 A Ridgeville Christian School.  
6 Q Is that here in Cincinnati?  
7 A Actually it's in Springboro, Ohio. I  
8 graduated in 1991.  
9 Q Have you had any formal education since  
10 you graduated from high school?  
11 A No formal education, sir.  
12 Q If you could please, tell me about your  
13 employment history since graduation from high school.  
14 A Sure. Right in -- I kind of took the  
15 summer off after I graduated, just kind of hung out,  
16 but my first job I got with a company called Palmer  
17 Temps and I worked at Crystal Tissue for like two weeks  
18 doing some basic clerk work. I found out from a friend  
19 of mine's father that a customer service position was  
20 open at ARAMARK Uniform Services. I worked at ARAMARK  
21 Uniform Services for six years. The first four being  
22 as a customer service representative, the next three or  
23 two and a half to three because it was actually closer  
24 to seven by the time I have left, I worked as a market  
25 center secretary from the gentlemen that actually got

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1 me hired in the first place. His secretary retired.  
2 And I worked as an executive secretary for -- he was  
3 the general manager of that particular market center  
4 and they moved the group manager into that market  
5 center and then I worked for both of them for like a  
6 year and a half.  
7 Then after ARAMARK I went to work for  
8 New Life Worship Center as an executive assistant to  
9 two pastors.  
10 Q When did you begin your employment with  
11 New Life?  
12 A It was January of 1998.  
13 Q Did you first meet Mr. Brinker at  
14 ARAMARK?  
15 A No, sir. I met Mr. Bentz at ARAMARK.  
16 Q So you began with New Life in January  
17 of '98.  
18 A Yes, sir.  
19 Q How long were you there?  
20 A I was there until August of -- no, it  
21 was 2000, August of 2000.  
22 Q Did you then begin your employment with  
23 Castle Rock Consulting?  
24 A No, sir. I worked at Cincinnati  
25 Financial Insurance Company as a policy service

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1 operator. I was actually in training, that's what I  
2 was going to be. And I also worked at Kohl's  
3 department store in the evenings, supplemental income.  
4 And I worked there until October of 2000, just a couple  
5 months. Then I met Mr. Brinker.

6 Q In October of 2000?

7 A Yes, sir.

8 Q Did you meet him through church or  
9 elsewhere?

10 A Actually I met him through Mr. Bentz.  
11 I was looking for a job, Mr. Bentz and I had kept up  
12 conversations. The variable annuity IRA that I rolled  
13 my 401K money into at the end of employment with  
14 ARAMARK Uniform Services, Mr. Bentz was working for WMA  
15 I believe as well and they got that for me. And then -  
16 - or he -- actually he helped me pick that particular  
17 IRA for my own. And -- and I saw him on and off like  
18 at dinner or whatever a couple times.

19 Throughout the time that I had left  
20 ARAMARK and the time that I then had expressed to them  
21 that I was looking for a better job and he said he knew  
22 of a job that I possibly would like and that could  
23 possibly interest me and then he introduced me to Mr.  
24 Brinker.

25 Q That was October of 2000?

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1 A Yes, sir.

2 Q And did you begin employment with one  
3 of the defendant companies?

4 A Was it October 2000 or '99? See, I'm  
5 getting confused and I'm sorry that I'm getting  
6 confused because that would been I haven't worked for  
7 John for a year and I have. It was '99. I'm sorry.  
8 It had to have been '99 now that I think about it.

9 Q So you met --

10 A I'm sorry. It was '99, yes.

11 Q -- Mr. Brinker through Mr. Bentz in  
12 October of '99?

13 A Mm-hmm. And that's when I started  
14 working for Castle Rock. I apologize. I am so sorry.

15 Q Castle Rock was your employer in  
16 October of '99?

17 A Yes, sir.

18 Q Was that the only defendant entity  
19 which you worked for?

20 A That was where my paycheck came from.  
21 As I understood it, Castle Rock consulting was a  
22 consulting firm and they generally leased employees out  
23 to other companies to do work for the other companies  
24 all of which were controlled by Mr. Brinker.

25 Q I don't want to put words in your

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20

1 mouth, by all means correct if I'm wrong, but that  
2 prior statement, all of which were controlled by Mr.  
3 Brinker --

4 A Mm-hmm.

5 Q -- the various companies here were  
6 controlled by Mr. Brinker?

7 A The companies that are listed in the  
8 subpoena in one way or another, besides Gary J. Bentz,  
9 but they are all relative to his name and were  
10 underneath his relative control, yes, sir.

11 Q What did you do for Castle Rock?

12 A What did I do for Castle Rock? My  
13 primary function was executive assistant to Mr.  
14 Brinker.

15 Q What did your duties entail?

16 A My duties entailed the general  
17 secretarial duties, typing, filing, took dictation,  
18 faxing, phone calls. I believe also I made travel  
19 arrangements, scheduled meetings. I would make phone  
20 calls for him occasionally. Pretty much did what he  
21 asked me to do as executive assistant.

22 Q I realize you were only with Castle  
23 Rock for three months or perhaps two and some  
24 percentage of a month in '99. Do you recall how much  
25 you were paid by Castle Rock in 1999?

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1 A In 1999? I know that when I was hired  
2 a condition of my employment or my acceptance of  
3 employment with him I put that I would make at least  
4 \$13.50 an hour because when I left ARAMARK Uniform  
5 Services I was making \$13.50. I believe -- and -- and  
6 I took a pay cut to go to the church, they can't afford  
7 \$13.50 an hour. And I was going to try to climb my way  
8 back up because it was promised that I would, but I  
9 think he offered me \$14.50 and I think that I was  
10 making \$14.50 an hour probably through December. So  
11 \$14.50 times however many weeks that was.

12 Q Fair enough. How about 2000, do you  
13 recall what you made? Were you salaried or --

14 A Salaried in 2000, yes, sir.

15 Q What was your salary that year?

16 A Probably between \$48,000 and \$52,000.

17 Q Was that pay in the form of regular  
18 biweekly paychecks?

19 A Yes, sir. We had biweekly paychecks  
20 paid on the 10th and the 25th of the month. We used  
21 Paychex payroll services and they cut the checks for  
22 us.

23 Q And how long were you employed by  
24 Castle Rock in 2001?

25 A In 2001 unless you are counting the

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1 volunteer time, zero hours.  
2 Q So no hours for pay in 2001?  
3 A No hours for pay in 2001.  
4 Q When did you receive your last paycheck  
5 from Castle Rock?  
6 A I received my last paycheck from Castle  
7 Rock I believe in -- I think it was October of 2000.  
8 And at that time another entity, Alpha Advantage, took  
9 over the payroll responsibilities if you will, again,  
10 using Paychexs. And I believe I got two or three,  
11 maybe four paychecks from Alpha Advantage, but the last  
12 one bounced in December.  
13 Q Of 2000?  
14 A Of 2000.  
15 Q Did Alpha Advantage pay the same amount  
16 per check as did Castle Rock?  
17 A No, sir, they did not. By that time  
18 John had said that he was going to give me a salary  
19 increase and he did, so I don't believe the amounts  
20 were the same.  
21 Q How much greater were they?  
22 A My salary was \$48,000 and I believe he  
23 was going to make it \$60,000, so however that works out  
24 division-wise twice --  
25 Q And you think you received two to four

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1 checks from Alpha Advantage, the last of which bounced?  
2 A I believe it was two to four, yes, sir,  
3 because it would have been two in November and then two  
4 in December, but the last one bounced. I can't  
5 remember exactly when we stopped -- when Castle Rock  
6 stopped and when Alpha took over.  
7 Q Which Paychexs location processed the  
8 Castle Rock payroll?  
9 A Cincinnati.  
10 Q Where in Cincinnati; do you know?  
11 A I have a Palm Pilot. I might be able  
12 to look it up in there if you want me to.  
13 MR. FLEITZ: Let's take a break.  
14 (OFF THE RECORD)  
15 THE WITNESS: I might remember location  
16 number.  
17 MR. FLEITZ: That's fine.  
18 THE WITNESS: One-fifty maybe or 151,  
19 something like that because I think all of our  
20 paperwork that we had to fill out had to have  
21 that number before it I believe.  
22 BY MR. FLEITZ:  
23 Q So it was perhaps Paychexs location  
24 number 151 that handled the payroll?  
25 A I think so.

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1 Q I think you testified that you reside  
2 at your parents' home. Do your parents continue to  
3 live there as well?  
4 A Yes, sir.  
5 Q What are their names?  
6 A [REDACTED] or [REDACTED]. and [REDACTED] or  
7 [REDACTED].  
8 Q Do you have any siblings that live  
9 there as well?  
10 A Yes, sir, I do.  
11 Q What are their names?  
12 A I have a sister, [REDACTED].  
13 Q Do you have any siblings that no longer  
14 reside there?  
15 A Yes, sir, I do.  
16 Q Who are they?  
17 A [REDACTED] and her married name is  
18 [REDACTED].  
19 Q Where does she reside?  
20 A [REDACTED] I don't remember the  
21 address.  
22 Q Could you spell that?  
23 A [REDACTED]  
24 Q Cincinnati?  
25 A Actually it's off of [REDACTED]. I think it's

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1 considered Lebanon, Lebanon, Ohio.  
2 Q Do you have any children?  
3 A No, sir. Not married.  
4 MR. FLEITZ: Off the record.  
5 (OFF THE RECORD)  
6 BY MR. FLEITZ:  
7 Q Do you have any brokerage accounts in  
8 your name?  
9 A Brokerage accounts? I believe I still  
10 -- I have one that has no money in it and one -- I have  
11 a life insurance investment through WRL that creates a  
12 -- a tax free environment for a vested program. I  
13 contribute \$75 a month directly out of my checking  
14 account.  
15 Q Where is the brokerage account that you  
16 think has no --  
17 A Same, WRL. And that was the fixed --  
18 fixed annuity IRA. And I recently took the rest of the  
19 money out of it because I needed to compensate myself  
20 to pay some bills.  
21 Q How much did you take out  
22 approximately?  
23 A Well, I started with \$8000. I took out  
24 \$4000 when I bought the house. I believe it had made  
25 some. I took out -- I think I had taken out some more,

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