

1 APPEARANCES:
 2 For the Plaintiff: A. CHAD ALLRED, ESQ.
 3 Ellis, Li & McKinstry
 4 Two Union Square
 5 601 Union Street, Suite 4900
 6 Seattle, WA 98101
 7 For the Defendants: BRIAN W. GRIMM, ESQ.
 8 Dorsey & Whitney
 9 U.S. Bank Centre
 10 1420 Fifth Avenue, Suite 3400
 11 Seattle, Wa 98101
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1 Seattle, Washington; Thursday, October 28, 2004
 2 9:35 a.m.
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 4 DEBORAH M. DEAN: Witness herein, having been
 5 duly sworn by the Notary,
 6 deposed and said as follows:
 7 E-X-A-M-I-N-A-T-I-O-N
 8 BY MR. ALLRED:
 9 Q. Good morning, Mrs. Dean. As you know, I'm
 10 Chad Allred, representing Tae Kim, who's now the
 11 judgment creditor in this case.
 12 We've been together in a deposition before,
 13 so we're both familiar with the process, but let me
 14 just say again that I will do my best to state clear
 15 questions. If you don't understand them, then I'll
 16 ask you to stop me and I'll do my best to restate the
 17 question in a clear manner.
 18 Also, I'll do my best to wait until you're
 19 done with your answer before I ask another question,
 20 and I'll ask you to try to wait until I'm done with my
 21 question before you give me my answer, that will make
 22 it easier for Keri as she records what we're saying.
 23 How's the coffee, by the way?
 24 A. It's okay.
 25 Q. Okay. What is your primary residential

1 E-X-H-I-B-I-T-S
 2 NO. DESCRIPTION PAGE
 3 1 Snohomish County Auditor Search Results 88
 4
 5 E-X-A-M-I-N-A-T-I-O-N
 6 BY PAGES
 7 MR. ALLRED 4 - 96
 8
 9
 10
 11
 12
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1 address?
 2 A. 22006-100th Avenue West, Edmonds,
 3 Washington, 98020.
 4 Q. And do you have any other residential
 5 addresses besides that one?
 6 A. No, I don't.
 7 Q. And do you have any other mailing addresses
 8 besides that one?
 9 A. No.
 10 Q. No other place that you get mail?
 11 A. There's a P.O. box in Riggins, Idaho.
 12 Q. What is that?
 13 A. That's for the business.
 14 Q. Okay. What is that P.O. box?
 15 A. 1426.
 16 Q. 1426, R-I-G-G-I-N-S?
 17 A. Yes.
 18 Q. And what's the zip code?
 19 A. 83549.
 20 Q. 83549?
 21 A. Yes.
 22 Q. What is your telephone number?
 23 A. 425-672-3556.
 24 Q. 672-3556?
 25 A. Yes.

1 Q. Are there any other telephone numbers that
 2 you use?
 3 A. 206-790-7383.
 4 Q. Any others?
 5 A. I use that as my cell phone and business
 6 phone. The first one is my home phone.
 7 Q. Okay. Any others that you use?
 8 A. There's 208-628-2719.
 9 Q. And what is that number?
 10 A. That's a number at a ranch.
 11 Q. And where is that ranch?
 12 A. In Idaho.
 13 Q. Any other phone numbers that you use?
 14 A. No.
 15 Q. Or any other numbers for homes or properties
 16 that you own or maintain?
 17 A. No.
 18 Q. Mrs. Dean, what corporations do you own or
 19 have an interest in?
 20 A. I own 3,000 shares in Canyon Pines RV
 21 Resort.
 22 Q. Canyon Pines RV Resort?
 23 A. Yes.
 24 Q. Where is that located?
 25 A. In Idaho.

1 Q. Is that a controlling interest in that
 2 company? In other words, do you know how many total
 3 shares there are in that company?
 4 A. You know, I'm not sure. I know they're a
 5 dollar a share.
 6 Q. Okay. Do you know how many total owners of
 7 Canyon Pines there are?
 8 A. I believe three.
 9 Q. And who are those owners?
 10 A. Be myself and David and Erin Dean.
 11 Q. David Dean is the gentleman that testified
 12 in the trial in this matter?
 13 A. Yes.
 14 Q. And who is Erin?
 15 A. His wife.
 16 Q. How do you spell that, E-R-I-N?
 17 A. Yes.
 18 Q. And where is Canyon Pines RV Resort located
 19 in Idaho?
 20 A. It's Pollock Idaho.
 21 Q. Can you spell that for me?
 22 A. P-O-L-L-O-C-K.
 23 Q. Do you know an address for Canyon Pines?
 24 A. 10 Barn Road.
 25 Q. 10 Barn Road?

1 A. Yes.
 2 Q. Pollock, Idaho?
 3 A. Yes.
 4 Q. And what is the zip code there?
 5 A. 83547.
 6 Q. 83547.
 7 Do you know a telephone number for Canyon
 8 Pines?
 9 A. 208-628-4006.
 10 Q. Do you know any other telephone numbers for
 11 Canyon Pines?
 12 A. No.
 13 Q. Do you know any other telephone numbers for
 14 David or Erin Dean?
 15 A. No.
 16 Q. Is that telephone number that you gave me
 17 one where I could reach David or Erin Dean?
 18 A. Yes.
 19 Q. And the 3,000 shares of Canyon Pines that
 20 you own, do you own those jointly with anyone else; in
 21 other words, are you the sole owner or --
 22 A. You mean my shares?
 23 Q. Right.
 24 A. No, just me.
 25 Q. In addition to Canyon Pines -- well, let me

1 ask, when did you buy those shares of Canyon Pines?
 2 A. Oh, I don't remember. I'd have to say in
 3 the last two years.
 4 Q. For a dollar apiece?
 5 A. Yes.
 6 Q. So, you paid a total of \$3,000?
 7 A. Yeah, I believe so.
 8 Q. In addition to Canyon Pines, what other
 9 companies do you own any interest in?
 10 A. I have 2,000 in Spectrum Northwest.
 11 Q. That's a Washington limited liability
 12 company?
 13 A. It's a Delaware corporation.
 14 Q. That's a corporation distinct from Spectrum
 15 Print & Mail?
 16 A. Yes.
 17 Q. And when was Spectrum Northwest created?
 18 A. I believe it was February 2002.
 19 Q. Are you the sole owner or are there
 20 additional owners?
 21 A. I'm a member.
 22 Q. Who are the other members?
 23 A. Jeff Dean, and there are other stockholders,
 24 and they are David Dean, Brett Dean, and Carl Dean.
 25 Q. When you say -- are you familiar with the

1 term limited liability company?
 2 A. Well, I've heard it, yes.
 3 Q. When you say that you're a member of
 4 Spectrum Northwest, what do you mean by that?
 5 A. Just a member of it, not the president or
 6 vice-president or anything like that.
 7 Q. Okay. Are you on the Board of Directors?
 8 A. I don't -- you know, I don't know. I don't
 9 take care of it.
 10 Q. Who primarily takes care of it?
 11 A. Jeff does.
 12 Q. Okay. Is Jeff the president?
 13 A. No, he's a member, also.
 14 Q. Are you and Jeff the only members?
 15 A. Except for those other stockholders.
 16 Q. Okay. So, all five of you are members?
 17 A. Right.
 18 Q. Okay. You're a stockholder, obviously?
 19 A. Yes.
 20 Q. Is Jeff a stockholder?
 21 A. No.
 22 Q. Any other stockholders besides the four that
 23 you've listed, including yourself?
 24 A. No.
 25 Q. How many shares total are there in Spectrum

1 clarification here; when I say companies, are there
 2 any other limited liability companies that you own or
 3 have an interest in?
 4 A. No.
 5 Q. Or any partnerships that you or Mr. Dean or
 6 have an interest in?
 7 A. No.
 8 Q. Any joint ventures that you or Mr. Dean own
 9 or have an interest in?
 10 A. No.
 11 Q. So, as far as you know, the only business
 12 entities that you or Mr. Dean own or have an interest
 13 in are Canyon Pines and Spectrum Northwest?
 14 A. Yes.
 15 Q. Are you a director of any company that you
 16 know of?
 17 A. I don't believe I have a title of director.
 18 I own the shares.
 19 Q. Okay. Well, what about companies other than
 20 Spectrum and Canyon Pines, are you a director of any
 21 other company? Are you on the board of any other
 22 company?
 23 A. You know, I might be a director on -- oh,
 24 shoot -- Spectrum Digital Printing, is that -- I think
 25 that's what Erica said her company is.

1 Northwest?
 2 A. I don't know.
 3 Q. Okay. Do you know what percentage interest
 4 you own; in other words, is your 2,000 shares 50
 5 percent of the stock or 20 percent of the stock?
 6 A. I'll have to ask Jeff. Like I said, I don't
 7 take care of it, sorry.
 8 Q. Okay. Do you know who the president is of
 9 Spectrum Northwest?
 10 A. I don't know that there is a president.
 11 Q. Okay. As far as you know, is there a
 12 vice-president or treasurer, anything like that?
 13 A. Don't know.
 14 Q. Okay. But as far as you know, Jeff
 15 primarily runs it?
 16 A. Yes.
 17 Q. Are there any other companies that you own
 18 or have an interest in?
 19 A. No.
 20 Q. Just Canyon Pines and Spectrum Northwest?
 21 A. Correct.
 22 Q. Any other companies that Jeff Dean owns or
 23 has an interest in that you know of?
 24 A. No.
 25 Q. I'm going to get a little technical just for

1 Q. This is Erica Cardas?
 2 A. Yes.
 3 Q. Other than that, are there any other
 4 companies that you are a director of?
 5 A. No.
 6 Q. Are you an officer in any company or
 7 corporation?
 8 A. I may be in name, I'm not sure.
 9 Q. Okay.
 10 A. That sounds terrible.
 11 Q. And which companies might you be an officer
 12 in?
 13 A. Canyon Pines, but I'm not sure.
 14 Q. Okay. Are you possibly an officer of
 15 Spectrum Northwest?
 16 A. I don't believe so.
 17 Q. Possibly an officer in Spectrum Digital
 18 Printing, or whatever the name of Erica Cardas's
 19 company is?
 20 MR. GRIMM: Can you define what you mean by
 21 officer, just so we're clear?
 22 Q. Well, what I mean technically is the company
 23 holding you out to be an officer, but I'm using it in
 24 as broad a term -- initially I'm using it in as broad
 25 a sense as possible, so does the company call you an

1 officer, or are you referred to as a president,
 2 vice-president, secretary, treasurer?
 3 A. With Erica's company, I think it's just
 4 director.
 5 Q. Okay. Tell me if I'm correct, with the
 6 possible exception of Canyon Pines, you don't believe
 7 you're an officer in any company?
 8 A. I don't think so, no.
 9 Q. And other than Canyon Pines and Spectrum
 10 Northwest, are you slightly -- may be a redundant
 11 question. Are you a shareholder in any company? Do
 12 you own stock in any other company?
 13 A. Besides those two?
 14 Q. Yes.
 15 A. No.
 16 Q. Do you own stock with a broker in publicly
 17 traded companies?
 18 A. No.
 19 Q. Okay. Do you own or have stock option
 20 rights in regard to any company or corporation?
 21 A. Stock option rights?
 22 Q. Right, do you own the ability to buy stock
 23 or shares in any company at a certain price?
 24 A. I don't know.
 25 Q. Is it fair to say that as far as you know,

1 A. I think that's Erin, and she's also the
 2 secretary.
 3 Q. Do you know who the treasurer is?
 4 A. No, I don't. I'd have to see the paperwork.
 5 Q. Is Jeff an officer or director of Canyon
 6 Pines?
 7 A. I don't believe so.
 8 Q. Is Jeff an officer or director of Spectrum
 9 Digital Printing?
 10 A. I don't think so, no.
 11 Q. And other than Canyon Pines, Spectrum
 12 Northwest, you don't know of Jeff owning an interest
 13 in any company?
 14 A. No.
 15 Q. Other than Canyon Pines, Spectrum Northwest,
 16 and Spectrum Digital Printing, do you know if Jeff's
 17 serving as an officer or director of any company?
 18 A. No.
 19 Q. Do you own or have a beneficial interest in
 20 any trusts?
 21 A. No.
 22 Q. Have you ever set up any trust?
 23 A. No. We were going to set up -- we set aside
 24 money for a continuing education trust for the nieces
 25 and nephews and grandchildren, but the money's only

1 you don't?
 2 A. Say that again.
 3 Q. Well, as far as you know, you do not own any
 4 stock options; is that an accurate statement?
 5 A. When you say stock options, you're saying
 6 the right to buy more, that type of thing?
 7 Q. Well, to generalize, companies will at times
 8 grant or sell an option to buy a certain amount of
 9 their shares at a certain price --
 10 A. Not that I'm aware of.
 11 Q. Okay. And as far as you know, you don't own
 12 the right to purchase any company; in other words, a
 13 right of first refusal or anything like that?
 14 A. If I do, I don't remember.
 15 Q. Let me ask, in regards to Canyon Pines, did
 16 you tell me how many shares total you think there are?
 17 You said you owned 3,000, you think there are how many
 18 total?
 19 A. I don't know.
 20 Q. And what percentage do your shares represent
 21 of the total amount of shares?
 22 A. I believe it's 60 percent.
 23 Q. Okay. Who is the president of Canyon Pines?
 24 A. I'm pretty sure it's David.
 25 Q. What about the vice-president?

1 set aside, it didn't develop into a trust.
 2 Q. How much money did you set aside?
 3 A. \$100,000.
 4 Q. Where is that money set aside?
 5 A. I think it was set with Spectrum Northwest.
 6 Q. But you believe that has not been placed
 7 into a trust?
 8 A. Correct.
 9 Q. Do you have -- has a trust document for that
 10 money been drafted or prepared?
 11 A. I don't believe so. There were tax
 12 implications or something that -- there was something
 13 about it getting very complicated, and so it wasn't
 14 set up as a trust.
 15 Q. Okay. Since this one was not actually put
 16 into a trust, as far as you know, you've never
 17 established a trust?
 18 A. Right.
 19 Q. And as far as you know, has Mr. Dean ever
 20 established a trust?
 21 A. No.
 22 Q. And has anyone ever established a trust for
 23 the benefit of you or for Mr. Dean?
 24 A. No.
 25 Q. And as far as you know, have you or Mr. Dean

1 given any assets to a third party who has then
 2 established any sort of trust?
 3 A. No.
 4 Q. Is there any person or entity that is
 5 holding assets for you or Mr. Dean?
 6 A. No.
 7 Q. Did you tell me when Canyon Pines was
 8 established? Do you know when it was established or
 9 created?
 10 A. 2003, I believe.
 11 Q. I'm going to ask you a series of questions
 12 about ownership of assets. When I ask those questions
 13 and I say own, I want to be clear what I'm asking. It
 14 will make it more efficient for all of us. I'm asking
 15 whether you own it or Mr. Dean owns it or whether
 16 Spectrum Northwest or Canyon Pines owns it. If you
 17 need to clarify that it's one of those in particular,
 18 then please tell me that; do you understand?
 19 A. Yes.
 20 Q. I'm also asking, when I ask whether you own
 21 it, whether you own any interest whatsoever, so I
 22 don't necessarily mean that you own all of it, I'm
 23 asking whether you own any interest, even if it's a
 24 partial, indirect, or beneficial interest; do you
 25 understand that?

1 A. I think it was \$
 2 Q. How many mo
 3 Edmonds house?
 4 A. There's the mo
 5 Q. Are there any c
 6 that?
 7 A. No. There's a
 8 Q. And who is th
 9 A. U.S. Bank.
 10 Q. Any other mor
 11 on the property?
 12 A. There's U.S. B
 13 Q. Okay. So, the
 14 mortgage?
 15 A. Yes.
 16 Q. There's a U.S.
 17 A. Yes.
 18 Q. And then a fur
 19 A. Yes.
 20 Q. With who?
 21 A. U.S. Bank.
 22 Q. Any others, be
 23 mortgage or lien or se
 24 A. Tae's judgmer
 25 Q. Any other enc

1 A. Yes.
 2 Q. You own the house there in Edmonds?
 3 A. Along with a mortgage that's on the house.
 4 Q. And that's the house at 22006-100th Avenue?
 5 A. Yes.
 6 Q. Do you own any other real estate in Edmonds?
 7 A. No.
 8 Q. Okay. So, if I refer to the Edmonds house,
 9 you'll understand that I'm referring to the house at
 10 that address?
 11 A. Yes.
 12 Q. You own that house in your home along with
 13 the mortgage?
 14 A. Yes.
 15 Q. Other than the mortgage, are there any other
 16 owners of that house?
 17 A. No.
 18 Q. And how long have you owned that house?
 19 A. Since February '97.
 20 Q. And who did you obtain that house from?
 21 A. I think their name was Reynolds.
 22 Q. You bought from them?
 23 A. Yes.
 24 Q. And how much did you pay the Reynolds for
 25 the house?

1 A. No.
 2 Q. The Washing
 3 grant that mortgage?
 4 A. I'm sorry?
 5 Q. When did tha
 6 created?
 7 A. When I boug
 8 Q. Okay. And w
 9 mortgage?
 10 A. I believe it's j
 11 Q. And you pay
 12 A. Yes.
 13 Q. When was the
 14 first taken out?
 15 A. I don't remerr
 16 probably '97 or '98.
 17 Q. And what's th
 18 A. About \$97,00
 19 Q. You pay on tl
 20 A. Generally.
 21 Q. Is a monthly j
 22 A. It is if you do
 23 finance charges.
 24 Q. Okay. And w
 25 interest from?

1 given any assets to a third party who has then
 2 established any sort of trust?
 3 A. No.
 4 Q. Is there any person or entity that is
 5 holding assets for you or Mr. Dean?
 6 A. No.
 7 Q. Did you tell me when Canyon Pines was
 8 established? Do you know when it was established or
 9 created?
 10 A. 2003, I believe.
 11 Q. I'm going to ask you a series of questions
 12 about ownership of assets. When I ask those questions
 13 and I say own, I want to be clear what I'm asking. It
 14 will make it more efficient for all of us. I'm asking
 15 whether you own it or Mr. Dean owns it or whether
 16 Spectrum Northwest or Canyon Pines owns it. If you
 17 need to clarify that it's one of those in particular,
 18 then please tell me that; do you understand?
 19 A. Yes.
 20 Q. I'm also asking, when I ask whether you own
 21 it, whether you own any interest whatsoever, so I
 22 don't necessarily mean that you own all of it, I'm
 23 asking whether you own any interest, even if it's a
 24 partial, indirect, or beneficial interest; do you
 25 understand that?

1 A. Yes.
 2 Q. You own the house there in Edmonds?
 3 A. Along with a mortgage that's on the house.
 4 Q. And that's the house at 22006-100th Avenue?
 5 A. Yes.
 6 Q. Do you own any other real estate in Edmonds?
 7 A. No.
 8 Q. Okay. So, if I refer to the Edmonds house,
 9 you'll understand that I'm referring to the house at
 10 that address?
 11 A. Yes.
 12 Q. You own that house in your home along with
 13 the mortgage?
 14 A. Yes.
 15 Q. Other than the mortgage, are there any other
 16 owners of that house?
 17 A. No.
 18 Q. And how long have you owned that house?
 19 A. Since February '97.
 20 Q. And who did you obtain that house from?
 21 A. I think their name was Reynolds.
 22 Q. You bought from them?
 23 A. Yes.
 24 Q. And how much did you pay the Reynolds for
 25 the house?

1 A. I think it was \$275,000.
 2 Q. How many mortgages are currently on the
 3 Edmonds house?
 4 A. There's the mortgage to Washington Mutual.
 5 Q. Are there any other mortgages, other than
 6 that?
 7 A. No. There's a home equity line.
 8 Q. And who is that with?
 9 A. U.S. Bank.
 10 Q. Any other mortgages or encumbrances or liens
 11 on the property?
 12 A. There's U.S. Bank, a security of \$375,000.
 13 Q. Okay. So, there's the Washington Mutual
 14 mortgage?
 15 A. Yes.
 16 Q. There's a U.S. Bank say equity line?
 17 A. Yes.
 18 Q. And then a further security interest?
 19 A. Yes.
 20 Q. With who?
 21 A. U.S. Bank.
 22 Q. Any others, besides those three, any other
 23 mortgage or lien or security interest?
 24 A. Tae's judgment.
 25 Q. Any other encumbrance that you know of?

1 A. No.
 2 Q. The Washington Mutual mortgage, when did you
 3 grant that mortgage?
 4 A. I'm sorry?
 5 Q. When did that mortgage -- when was it
 6 created?
 7 A. When I bought the house.
 8 Q. Okay. And what is the balance on that
 9 mortgage?
 10 A. I believe it's just under \$200,000.
 11 Q. And you pay on that monthly?
 12 A. Yes.
 13 Q. When was the U.S. Bank home equity line
 14 first taken out?
 15 A. I don't remember. I would have to say
 16 probably '97 or '98.
 17 Q. And what's the balance on that?
 18 A. About \$97,000.
 19 Q. You pay on that monthly?
 20 A. Generally.
 21 Q. Is a monthly payment required?
 22 A. It is if you don't want to have to pay the
 23 finance charges.
 24 Q. Okay. And what is this U.S. Bank security
 25 interest from?

1 A. It's something that Jeff was working on,
 2 some kind of a wind farm thing that he wanted to do,
 3 and we borrowed the money for.
 4 Q. When was that created?
 5 A. Probably 2002 or 2003.
 6 Q. When you say wind farm, you know where the
 7 energy from wind is captured to create electricity or
 8 something like that?
 9 A. The windmills that they use in California
 10 and stuff.
 11 Q. Okay. Did Mr. Dean begin a business in
 12 regard to that?
 13 A. No.
 14 Q. Did he buy some equipment in regard to that?
 15 A. No, he didn't.
 16 Q. What was the money used for?
 17 A. It hasn't been used yet.
 18 Q. Okay. What's the balance on that U.S. Bank
 19 security interest?
 20 A. It's just 375.
 21 Q. Has that money actually been taken out? I'm
 22 just trying -- you said that the money hasn't been
 23 used, I'm trying to understand, did you or Mr. Dean
 24 actually receive 375 from the bank?
 25 A. I think it's like a line of credit or

1 home in any way?
 2 A. Not that I'm aware of.
 3 Q. That house is currently for sale?
 4 A. Yes, it is.
 5 Q. And when did you first place it for sale?
 6 A. Early May.
 7 Q. And what were you asking in May?
 8 A. In May we were asking 895.
 9 Q. The home is still for sale?
 10 A. Yes.
 11 Q. And what are you asking now?
 12 A. 824,950.
 13 Q. And do you have a real estate broker that's
 14 showing the house or offering the house?
 15 A. Yes.
 16 Q. Who is that?
 17 A. John L. Scott.
 18 Q. What broker in particular or what agent in
 19 particular?
 20 A. Her name is Terri -- oh, gosh -- Lindman.
 21 Q. How do you spell that?
 22 A. I think it's L-I-N-D-M-A-N.
 23 Q. Do you have a phone number for her?
 24 A. Not with me.
 25 Q. Okay. Have you been working with Terri

1 something.
 2 Q. Okay. And what is the current balance of
 3 that line of credit?
 4 A. I don't think there is one. I don't think
 5 we've touched it.
 6 Q. Okay. The first U.S. Bank home equity line
 7 that we talked about, you said that the current
 8 balance is about 97,000?
 9 A. Yes.
 10 Q. What is that total amount available for that
 11 line of credit?
 12 A. 100,000.
 13 Q. So, you have about 3,000 left?
 14 A. Yes.
 15 Q. This third one, the U.S. Bank line of credit
 16 in regard to the windmills, total is 375, but you
 17 haven't touched any of it?
 18 A. That's right.
 19 Q. So, the balance owed is zero?
 20 A. Right.
 21 Q. So, aside from Tae's judgment, is it
 22 accurate that the total encumbrances or liens on your
 23 Edmonds home total just under 300,000?
 24 A. Yes.
 25 Q. No one else has a rider claim against that

1 Lindman since you placed the house for sale in May?
 2 A. Yes.
 3 Q. Have you worked with any other brokers or
 4 agent in trying to sell the house this year?
 5 A. Her partner.
 6 Q. Who is that?
 7 A. Terri --
 8 Q. Another Terri?
 9 A. I'm sorry, Tami.
 10 Q. Okay.
 11 A. I think it's McGilvra.
 12 Q. Can you spell that?
 13 A. M-C capital G-I-L-V-R-A, McGilvra. I
 14 believe that's it.
 15 Q. Can I get you some more coffee?
 16 A. Sure.
 17 Q. You don't have a phone number for Tami
 18 either?
 19 A. Not off the top of my head.
 20 Q. Have you had any offers to buy the house?
 21 A. No, unfortunately.
 22 Q. None at all?
 23 A. Nothing.
 24 Q. No sale pending currently?
 25 A. No.

1 Q. Has anyone presented a proposed purchase and
 2 sale agreement?
 3 A. No.
 4 Q. Other than the Edmonds house, do you own any
 5 other houses?
 6 A. No.
 7 Q. And again, I won't repeat this each time,
 8 but I mean not only you but Mr. Dean as well and
 9 Spectrum Northwest and Canyon Pines, do any of those
 10 people or entities own any house, other than the
 11 Edmonds house?
 12 A. Spectrum has property in Idaho on which a
 13 house is being built.
 14 Q. Okay.
 15 MR. GRIMM: I'm going to object to your
 16 definition of you, I think it's a little confusing
 17 whenever you ask do you own, I always assume you're
 18 referring to her, so I think it's a little confusing
 19 that you're using that to refer to the corporation as
 20 well.
 21 MR. ALLRED: Okay. I'll try to clean that
 22 up a bit.
 23 Q. Spectrum Northwest owns property in Idaho?
 24 A. Yes.
 25 Q. And what's the address of that property?

1 A. There is no address.
 2 Q. Okay. It's that P.O. Box 1426?
 3 A. Yes.
 4 Q. What county is the property in in Idaho?
 5 A. Idaho.
 6 Q. I'm sorry?
 7 A. Idaho.
 8 Q. Idaho County?
 9 A. Yes.
 10 Q. Idaho County, Idaho?
 11 A. Yes.
 12 Q. Is it within the city limits of any city?
 13 A. It's in Pollock, Idaho.
 14 Q. In Pollock, okay.
 15 And I've never been to Pollock, but is it
 16 near any landmarks or streets there?
 17 A. Highway 95.
 18 Q. Okay. On Highway 95 or near it?
 19 A. Near it.
 20 Q. Do you take Highway 95 to get to it?
 21 A. Yes.
 22 Q. And why don't you give me directions from
 23 Highway 95 to the property.
 24 A. From Highway 95, you get onto Fuzi Road.
 25 Q. How do you spell Fuzi?

1 A. F-U-Z-I.
 2 Q. Okay.
 3 A. Off of Fuzi Road is a dirt mountain road.
 4 Q. Okay. Do you know the name or number for
 5 that?
 6 A. There's no number. It's a road that travels
 7 through lands to get to BLM land and the national
 8 forest.
 9 Q. So, you take the dirt mountain road -- when
 10 you say BLM, you mean Bureau of Land Management?
 11 A. Yes.
 12 Q. What forest is that, do you know?
 13 A. I think it's the Frank Church Wilderness.
 14 Q. That's federal land, Bureau of Land
 15 Management?
 16 A. I believe so.
 17 Q. When did Spectrum acquire this property?
 18 A. I think that was 2002.
 19 Q. And how much did Spectrum pay for it?
 20 A. I believe that was 600,000, and it's still
 21 on contract.
 22 Q. You're paying out the contract to the
 23 previous owner?
 24 A. Right.
 25 Q. You paid 600,000 originally?

1 A. No.
 2 Q. 600,000 is the total price?
 3 A. That was the total price. I don't remember
 4 what we paid down on it.
 5 Q. Do you know whether you paid down more or
 6 less than a hundred thousand?
 7 A. I don't remember.
 8 Q. Do you know how much of the 600,000 you've
 9 paid at this point?
 10 A. I'd have to look it up, or I'd have to ask
 11 Jeff.
 12 Q. Do you know whether you've paid more or less
 13 than a hundred thousand on it so far?
 14 A. I think a hundred thousand or more.
 15 Q. Are you paying on that on a monthly basis?
 16 A. No, I believe that's an annual payment.
 17 MR. GRIMM: And all these questions you're
 18 asking about Spectrum, is that right, whether
 19 Spectrum's paying?
 20 MR. ALLRED: Let me get to that.
 21 Q. Is the property held in the name of Spectrum
 22 Northwest?
 23 A. Yes.
 24 Q. And it's Spectrum that's making these
 25 payments?

1 A. Yes.
 2 MR. ALLRED: Then yeah, I am.
 3 Q. And how much is the annual payment?
 4 A. I don't know.
 5 Q. No idea at all?
 6 A. I really don't, and I don't want to be
 7 guessing and throw something out there that's
 8 completely wrong.
 9 Q. Do you know how long the contract is for?
 10 A. I thought it was for seven years.
 11 Q. Seven years from 2002?
 12 A. I think so.
 13 Q. So, by the end of the seven years, Spectrum
 14 Northwest was to have paid the full 600,000?
 15 A. I believe so, yes.
 16 Q. And who is Spectrum Northwest buying this
 17 property from?
 18 A. Their last name was -- no, wait --
 19 Schrimsher.
 20 Q. Do you know how to spell that?
 21 A. S-C-H -- I think just the rest of it the way
 22 it sounds.
 23 Q. S-C-H-R --
 24 A. R-I-M-S-H-E-R.
 25 Q. Okay. Do you know the first name of either

1 the land?
 2 A. No.
 3 Q. So, you're building a house now?
 4 A. Yes.
 5 Q. This is a residence?
 6 A. Yes.
 7 Q. For you and Mr. Dean?
 8 A. Yes.
 9 Q. And when is that expected to be completed?
 10 A. Probably -- well, prior to some of the
 11 things that have happened this year, we thought it
 12 might have been finished this year.
 13 Q. Okay. Who is actually doing the
 14 construction on the house?
 15 A. We've been doing a great deal of it
 16 ourselves after the shell was completed.
 17 Q. So, it's been framed and the roof is on?
 18 A. Yes.
 19 Q. Are the outer walls built?
 20 A. Yes.
 21 Q. Inner walls built and the sheetrock up and
 22 so forth?
 23 A. The majority of it, yes.
 24 Q. How many square feet is the house?
 25 A. Maybe 3,000 square feet.

1 of them?
 2 A. Steve and Nancy.
 3 Q. How many acres is the property in Idaho?
 4 A. 720.
 5 Q. Is that property actually in the Frank
 6 Church Wilderness?
 7 A. No. Oh, no, it's not in.
 8 Q. So, it's on the road towards the Frank
 9 Church Wilderness?
 10 A. Right.
 11 Q. Are there any structures on the property
 12 right now?
 13 A. We're building a house.
 14 Q. Okay. Are there any other -- besides the
 15 one that you're building, are there any other houses
 16 on the property?
 17 A. No.
 18 Q. Are there any barns?
 19 A. There's a barn.
 20 Q. Is there a stable? Is there a stable
 21 connected with the barn?
 22 A. Oh, well, you can call it a stable or a
 23 barn. We call it a barn.
 24 Q. But other than that barn and the house
 25 you're building, any other buildings or structures on

1 Q. Is all the plumbing in?
 2 A. Yes.
 3 Q. In other words, can you live in it right
 4 now?
 5 Do you ever spend the night there?
 6 A. No.
 7 Q. Any contractors working on it right now?
 8 A. There are people working on it.
 9 Q. Who is working on it?
 10 A. David is working on it.
 11 Q. David Dean?
 12 A. Yes.
 13 Q. Anyone else?
 14 A. He may get people to help him out, I don't
 15 know.
 16 Q. Okay. Have you hired any professional
 17 contractor to come in and work on it?
 18 A. Not at this point.
 19 Q. Okay. Do David and Erin live in Pollock as
 20 well?
 21 A. Yes.
 22 Q. Do they live at the Canyon Pines RV Resort?
 23 A. Yes.
 24 Q. And how many minutes away from the Idaho
 25 ranch is that?

1 A. Probably ten minutes.
 2 Q. In putting your Edmonds house up for sale in
 3 May, was your plan to move to the Idaho ranch?
 4 A. Yes.
 5 Q. I think Mr. Grimm makes a good point about
 6 being clear about this ownership interest, so why
 7 don't we talk about you for a minute, and then we'll
 8 come back and talk about Mr. Dean and the companies.
 9 Other than the Edmonds house, and putting
 10 aside for the moment the Idaho property, do you own or
 11 have an interest in any other real estate?
 12 A. No. There's a condo boat slip up in
 13 Semiahmoo.
 14 Q. Is there an address for that condo?
 15 A. It's Semiahmoo Marina.
 16 Q. Okay. Is the condo right there at the
 17 marina?
 18 A. Yes.
 19 Q. Okay. And is there a mailing or street
 20 address for the condo or for the marina?
 21 A. There is, but I don't know it off --
 22 Q. In care of the marina there?
 23 A. Right.
 24 Q. What's the condo number?
 25 A. C-12.

1 Q. Is it encumbered in any way?
 2 A. No.
 3 Q. No liens or claims against it?
 4 A. No.
 5 Q. Okay. Leaving aside the Idaho property,
 6 other than the Edmonds house and the boat slip in
 7 Semiahmoo, do you own or have an interest in any other
 8 real estate?
 9 A. No.
 10 Q. No farms or ranches?
 11 A. No.
 12 Q. No buildings of any sort?
 13 A. No.
 14 Q. No vacant land?
 15 A. No.
 16 Q. No condominiums?
 17 A. No.
 18 Q. No time shares?
 19 A. No.
 20 Q. No property held in trust?
 21 A. No.
 22 Q. Do you have a leasehold interest in any
 23 property? In other words, are you leasing any
 24 property or building anywhere?
 25 A. No.

1 Q. Is there a phone number there?
 2 A. No.
 3 Q. And is the condo and boat slip built
 4 together, or is there a separate number for the boat
 5 slip?
 6 A. No, no, it's what you call a condo boat
 7 slip; it's not a condominium, it's a boat slip.
 8 Q. Is there any place to stay there at the
 9 condo boat slip? I'm just confused by the
 10 terminology. It's just a boat slip?
 11 A. Right.
 12 Q. Owned through a condominium association?
 13 A. Well, owned through the marina. They
 14 just -- that's what they call it.
 15 Q. Okay, gotcha.
 16 You own that?
 17 A. Jeff and I own that.
 18 Q. Okay. And when did you buy that?
 19 A. Well, it's been a few years ago. I'm just
 20 trying to remember. It might have been '99 or 2000, I
 21 honestly don't remember.
 22 Q. And how much did you pay for it?
 23 A. \$26,000.
 24 Q. You actually own it, it's not a lease?
 25 A. Right.

1 Q. Other than -- well, let me ask: Does Jeff
 2 Dean own any real estate or have any interest in any
 3 real estate?
 4 A. No.
 5 Q. Again, no houses, farms, or ranches?
 6 A. No.
 7 Q. No condominiums?
 8 A. No.
 9 Q. No buildings or vacant land?
 10 A. No.
 11 Q. No time shares?
 12 A. No.
 13 Q. Does he have any leased property?
 14 A. No.
 15 THE WITNESS: Can we take a break?
 16 MR. GRIMM: Sure, that would be fine.
 17 (Brief recess.)
 18 Q. Mrs. Dean, in regard to the mortgage on your
 19 Edmonds house which you referred to as the Washington
 20 Mutual mortgage --
 21 A. Yes.
 22 Q. -- was that originally a mortgage held by
 23 Great Western Bank?
 24 A. You know, it may have been, and then I think
 25 sometimes banks sell their loans or something.