

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SNOHOMISH

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TAE YON KIM, )  
 Plaintiff, )  
 vs. ) No. 01-2-10500-9  
 JEFFREY DEAN, DEBORAH M. DEAN, )  
 and the marital community composed )  
 of JEFFREY DEAN and DEBORAH M. )  
 DEAN, )  
 Defendants. )

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Deposition Upon Oral Examination Of  
DEBORAH M. DEAN

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9:35 a.m.  
 October 28, 2004  
 601 Union Street, Suite 4900  
 Seattle, Washington

REPORTED BY: Keri A. Aspelund, RPR, CCR No. 2661

1 Q. Right. Do you know if that happened in  
 2 regard to this one?  
 3 A. It sounds familiar.  
 4 Q. And in regard to the Idaho property, are  
 5 there any encumbrances on that house? Anyone have a  
 6 claim?  
 7 A. No.  
 8 Q. No mortgages at all?  
 9 A. No.  
 10 Q. Either on the property or the house?  
 11 A. The real estate contract that I told you  
 12 about.  
 13 Q. Right. But other than that, you don't know  
 14 of any mortgage of any sort?  
 15 A. No.  
 16 Q. Any kind of construction lien or mortgage on  
 17 the house?  
 18 A. Not that I'm aware of.  
 19 Q. Did you pay someone to frame the house?  
 20 A. Yes.  
 21 Q. And that contractor or person has been paid  
 22 off in full?  
 23 A. Yes.  
 24 Q. And to clarify, pick up where we left off  
 25 before the break, you don't know of any real estate

1 that Jeff Dean owns or has an interest in?  
 2 A. No.  
 3 Q. And as far as you know, he does not own or  
 4 have an interest in any real estate?  
 5 A. Just the boat slip, as I told you.  
 6 Q. But nothing else?  
 7 A. No.  
 8 Q. My statement's correct?  
 9 A. Yes.  
 10 Q. Does Canyon Pines RV Resort own a piece of  
 11 property that it sits on?  
 12 A. Yes. I mean, yes.  
 13 Q. It's not leasing the land from someone else?  
 14 A. No, it's not.  
 15 Q. And how many acres is that resort?  
 16 A. Approximately seven.  
 17 Q. That's within the Pollock city limits?  
 18 A. Yes.  
 19 Q. Other than that seven acres, does Canyon  
 20 Pines own or have an interest in any other real  
 21 estate?  
 22 A. Not that I'm aware of.  
 23 Q. Other than the 720 acres in Idaho, does  
 24 Spectrum Northwest own or have an interest in any  
 25 other real estate?

1 A. No.  
 2 Q. Does it own any other houses, farms, or  
 3 ranches?  
 4 A. No.  
 5 Q. Does it own any other buildings or vacant  
 6 land?  
 7 A. No.  
 8 Q. Does it own any condominiums or time shares?  
 9 A. No.  
 10 Q. Does Spectrum Northwest have any property  
 11 held in trust on its behalf?  
 12 A. No.  
 13 Q. Is it holding any property in trust for  
 14 anyone else?  
 15 A. Not that I'm aware of.  
 16 Q. Is Spectrum Northwest leasing any land?  
 17 A. No.  
 18 Q. Or any other property?  
 19 A. No.  
 20 Q. What is the primary business of Spectrum  
 21 Northwest?  
 22 A. Property development and management.  
 23 Q. How many pending property development  
 24 projects does it have right now?  
 25 A. It did Canyon -- developed Canyon Pines

1 already, and it was developing the ranch, the house  
 2 and the barn that we discussed.  
 3 Q. Has it developed or managed any other real  
 4 estate projects?  
 5 A. No.  
 6 Q. Other than David and Erin Dean, are there  
 7 any other people living at Canyon Pines related to you  
 8 or Mr. Dean?  
 9 A. No.  
 10 Q. And do you or Mr. Dean own an RV?  
 11 A. No.  
 12 Q. How many employees does Spectrum Northwest  
 13 have?  
 14 A. None.  
 15 Q. Has it ever had any employees?  
 16 A. No.  
 17 Q. How many bank accounts do you or Mr. Dean  
 18 own?  
 19 A. One.  
 20 Q. And where is that?  
 21 A. U.S. Bank.  
 22 Q. And whose name is it in?  
 23 A. My name.  
 24 Q. Your name only?  
 25 A. Yes.

1 Q. Deborah Dean?  
 2 A. Yes.  
 3 Q. And what branch do you primarily use in  
 4 regard to that account?  
 5 A. Edmonds.  
 6 Q. And what's the balance in that account?  
 7 A. About \$700.  
 8 Q. Is that a checking account?  
 9 A. Yes.  
 10 Q. Other than yourself, is there anyone else  
 11 that has signature authority on that account?  
 12 A. No.  
 13 Q. Mr. Dean doesn't?  
 14 A. No.  
 15 Q. Do you know the account number for that  
 16 account?  
 17 THE WITNESS: I have to supply my account  
 18 number?  
 19 MR. GRIMM: If you know, you have to say  
 20 what it is. If you don't know...  
 21 A. 153501123159.  
 22 Q. Let me repeat that, 1535 -  
 23 A. 01123159.  
 24 Q. You don't have any other savings accounts or  
 25 any other kind of account at U.S. Bank?

1 A. No.  
 2 Q. Other than that one bank account at U.S.  
 3 Bank, do you or Mr. Dean own or use any other accounts  
 4 at any other financial institutions?  
 5 A. No.  
 6 Q. Do you or Mr. Dean own or have any  
 7 retirement accounts?  
 8 A. No.  
 9 Q. No IRA of any sort?  
 10 A. No.  
 11 Q. Other than the shares in Spectrum Northwest  
 12 and Canyon Pines, do you or Mr. Dean own or have any  
 13 stock or mutual funds?  
 14 A. No.  
 15 Q. Do you have any stock or mutual fund  
 16 accounts?  
 17 A. No.  
 18 Q. Do you or Mr. Dean own or have any interest  
 19 in any sort of intellectual property?  
 20 A. No.  
 21 Q. Are there any debts owed to you or Mr. Dean?  
 22 A. At some point I believe Erica would pay me  
 23 back the money that I put into her company, the  
 24 Spectrum Digital.  
 25 Q. How much is that?

1 A. I think it's about 45,000 U.S.  
 2 Q. And when is that money due back to you?  
 3 A. I don't remember. There wasn't any -- I  
 4 don't believe there was any particular time frame on  
 5 it.  
 6 Q. Remind me of when you made that transfer,  
 7 45,000?  
 8 A. Probably 2001, maybe the end of 2000.  
 9 Q. And was there any paperwork that evidenced  
 10 that transaction?  
 11 A. I'm sure there is. I mean, there's got to  
 12 be paperwork on it.  
 13 Q. Do you know if the money -- did you transfer  
 14 45,000, is that what you transferred to her company or  
 15 to her for her company?  
 16 A. Right, I mean, it was given to her somehow.  
 17 Q. But it was about 45,000?  
 18 A. Yes.  
 19 Q. Was that made as an investment in the  
 20 company or as a loan to be repaid later?  
 21 A. I don't remember.  
 22 Q. Have you and Erica or you and Jeff discussed  
 23 when that money will be repaid?  
 24 A. When it was first put in there, I would  
 25 imagine that was discussed, but I don't recall at this

1 point, and it hasn't been discussed since.  
 2 Q. Other than this money potentially coming  
 3 back from Erica or her company, are there any other  
 4 debts owed to you or Mr. Dean?  
 5 A. No.  
 6 Q. Are there any other gifts that have been  
 7 promised or expressed to you or Mr. Dean?  
 8 A. No.  
 9 Q. How much cash do you or Mr. Dean own?  
 10 A. Whatever I have in my wallet.  
 11 Q. Okay. How much is that?  
 12 A. I don't know. Do you want me to look?  
 13 Q. Just give me a ballpark figure?  
 14 A. Say a hundred dollars.  
 15 Q. Okay. So, there's the money in your wallet,  
 16 about 700 in U.S. Bank?  
 17 A. Yes.  
 18 Q. And what else?  
 19 A. That's it, other than what's in Spectrum.  
 20 Q. And what's in Spectrum?  
 21 A. I'm not sure. I don't do the books.  
 22 Q. Who does the books?  
 23 A. Jeff.  
 24 Q. Do you or Mr. Dean own any vehicles?  
 25 A. Yes.

1 had were sold; any other income that you or Mr. Dean  
2 have?

3 A. No.

4 Q. No one, other than possibly Spectrum Digital  
5 printing, no person or entity sends you checks on a  
6 regular basis?

7 A. No. Canyon Pines was supposed to be, but  
8 they're not at that point yet.

9 Q. Does any other person or entity pay expenses  
10 for you or Mr. Dean?

11 A. No.

12 Q. Other than the Idaho ranch and the land that  
13 Canyon Pines is sitting on, does Spectrum Northwest or  
14 Canyon Pines own any real estate?

15 A. No. I thought we did this already.

16 Q. We talked about you and Mr. Dean.

17 A. Oh.

18 Q. So, neither Spectrum Northwest nor Canyon  
19 Pines owns any vacant land, other than those that  
20 we've identified --

21 A. No.

22 Q. -- doesn't own any vacant land, buildings,  
23 houses?

24 A. No.

25 Q. No farms or ranches?

1 A. I don't think so.

2 Q. What other accounts does Spectrum Northwest  
3 have, use, or own?

4 A. There is whatever were the accounts that the  
5 money came from that we paid to McNaul Ebel. As I  
6 said before, Jeff takes care of those, and I would  
7 have to -- I'd have to find out from him when I can.

8 Q. These are investment accounts of some sort?

9 A. Some kind.

10 Q. But you believe those are empty at this  
11 point?

12 A. I think we pretty much wiped them out. I  
13 don't -- I have to find out.

14 Q. Do you know of any other -- were those bank  
15 accounts or were they held with some kind of  
16 brokerage?

17 A. Well, they're accounts with U.S. Bankcorp  
18 that he -- I don't...

19 Q. Do you believe those accounts are still  
20 open?

21 A. You know, I don't know. I mean, like I  
22 said, they were closed or sold or whatever it was that  
23 he had because we had to pay that money to --

24 Q. When you say you believe they were pretty  
25 much wiped out, do you believe that any of those

1 A. No.

2 Q. No condominiums or time shares?

3 A. No.

4 Q. Do either of those companies hold any  
5 property whatsoever in trust?

6 A. No.

7 Q. Do you know of any trusts that are set up or  
8 function for the benefit of Spectrum Northwest or  
9 Canyon Pines?

10 A. No.

11 Q. How many bank accounts does Spectrum  
12 Northwest have?

13 A. It has its checking account and its --

14 Q. Let me start, where is the checking account  
15 held?

16 A. U.S. Bank.

17 Q. Primarily using the Edmonds branch?

18 A. Yes.

19 Q. What's the account number for that account?

20 A. That one I don't know.

21 Q. What's the balance in that account?

22 A. I would have to look it up.

23 Q. Do you know the approximate balance?

24 A. Not off the top of my head, I don't.

25 Q. Is it over \$50,000?

1 accounts has over a thousand dollars in any one of  
2 them?

3 A. They could have. I don't know.

4 Q. And how many were there? Don't know that  
5 either?

6 A. I don't know.

7 Q. Other than accounts at U.S. Bank or U.S.

8 Bankcorp, what accounts does Spectrum Northwest use or  
9 own at any financial institution?

10 A. That's all.

11 Q. And other than those -- okay.

12 A. Excuse me.

13 Q. That's okay.

14 Other than these U.S. Bank accounts that  
15 you've identified, does Spectrum Northwest own any  
16 stock or mutual fund accounts that you know of?

17 A. No.

18 Q. Does Spectrum Northwest own any sort of  
19 stock or stock options that you know of?

20 A. No.

21 Q. Does Spectrum Northwest own any stock in  
22 Spectrum Digital Printing?

23 A. You know, it could or I could if -- because  
24 of that money that was put in, but I would have to  
25 find out.

1 Q. Do you pay any personal expenses out of the  
 2 Spectrum Northwest checking account?  
 3 A. No.  
 4 Q. Have you ever transferred money out of the  
 5 Spectrum Northwest accounts into your personal  
 6 accounts?  
 7 A. Yes.  
 8 Q. When is the last time you did that?  
 9 A. Last week.  
 10 Q. That was from the Spectrum Northwest account  
 11 at U.S. Bank to your --  
 12 A. Personal checking.  
 13 Q. At U.S. Bank?  
 14 A. Yes.  
 15 Q. How much did you transfer?  
 16 A. I think -- I believe it was \$1,500.  
 17 Q. And how often have you made transfers like  
 18 that during the last year from Spectrum to your  
 19 personal account?  
 20 A. Probably monthly.  
 21 Q. And what's the approximate total in which  
 22 you've done that monthly?  
 23 A. I'm sorry, what?  
 24 Q. If you're doing it monthly, about how much  
 25 have you transferred each month over the last year?

1 A. Oh, it varies. It can be a thousand  
 2 dollars, it can be \$2,000.  
 3 Q. Have you ever transferred over \$2,000 from  
 4 Spectrum Northwest in one month?  
 5 A. I'd have to go back and look. I don't  
 6 recall at this moment if I have.  
 7 Q. You then pay for personal expenses out of  
 8 your personal account?  
 9 A. Yes.  
 10 Q. Do you know how many accounts Canyon Pines  
 11 owns?  
 12 A. I know they have one at U.S. Bank; other  
 13 than that, I don't know.  
 14 Q. Do you or Jeff have signature authority on  
 15 that account?  
 16 A. I have.  
 17 Q. Is that a checking account?  
 18 A. Yes.  
 19 Q. Are you the only one with signature  
 20 authority on that account?  
 21 A. No.  
 22 Q. Who has signature authority?  
 23 A. David Dean and Erin Dean.  
 24 Q. And you?  
 25 A. Yes.

1 Q. No one else?  
 2 A. No.  
 3 Q. What's the approximate balance in that  
 4 account?  
 5 A. I don't know. Erin manages that account.  
 6 Q. Have you ever received any payments or  
 7 transfers from that account?  
 8 A. When they got a mortgage, they had to pay  
 9 Spectrum back, and they paid something back, they made  
 10 the deposit themselves, and I think it was in the  
 11 neighborhood of \$30,000.  
 12 Q. Who got a mortgage, Erin and David  
 13 personally or Canyon Pines?  
 14 A. Canyon Pines.  
 15 Q. A mortgage on the RV resort?  
 16 A. On something on the RV resort, probably the  
 17 buildings.  
 18 Q. Why was there a payment required back to  
 19 Spectrum?  
 20 A. Because Spectrum put money into it, and it  
 21 was paying us back.  
 22 Q. About \$30,000?  
 23 A. Right.  
 24 Q. Other than that, have you ever received a  
 25 payment from Canyon Pines?

1 A. I don't believe so.  
 2 Q. Have you ever written a check on the Canyon  
 3 Pines account?  
 4 A. Have I written a check of the Canyon  
 5 Pines --  
 6 Q. Uh-huh.  
 7 A. I don't think I have, no.  
 8 Q. Have you ever made deposits or withdrawals  
 9 into the Canyon Pines account?  
 10 A. Deposits, yes.  
 11 Q. When is the last time you made a deposit?  
 12 A. Either September or October.  
 13 Q. And how much did you deposit?  
 14 A. Somewhere between a thousand and \$1,200.  
 15 Q. And what was the purpose of that?  
 16 A. David is doing some contract labor for the  
 17 ranch.  
 18 Q. Is this work on the home?  
 19 A. Yes.  
 20 Q. That was a deposit out of the Spectrum  
 21 Northwest account?  
 22 A. Yes, I think -- yes.  
 23 Q. Into the Canyon Pines account?  
 24 A. Yes.  
 25 Q. Does Canyon Pines own any stock or shares in

1 any company, that you know of?  
 2 A. Not that I know of, no.  
 3 Q. Does it have any other accounts with  
 4 financial institutions, other than the U.S. Bank  
 5 account?  
 6 A. I don't know.  
 7 Q. To your knowledge, do Spectrum Northwest or  
 8 Canyon Pines own any intellectual property?  
 9 A. I don't think so.  
 10 Q. Do Spectrum Northwest or Canyon Pines own  
 11 any vehicles?  
 12 A. Spectrum owns a Dodge Ram.  
 13 Q. Truck?  
 14 A. Yes, pickup truck.  
 15 Q. What year?  
 16 A. I think it's 1999.  
 17 Q. Registered in Idaho?  
 18 A. Yes.  
 19 Q. In Spectrum Northwest's name?  
 20 A. Yes.  
 21 Q. Do you know the approximate mileage on that  
 22 car?  
 23 A. Let's say 50,000 miles.  
 24 Q. Does Spectrum Northwest or Canyon Pines own  
 25 any other vehicles?

1 tillers, mowers, seeder.  
 2 Q. Any animals owned by Spectrum Northwest or  
 3 Canyon Pines?  
 4 A. The horses.  
 5 Q. Sky and Emma?  
 6 A. Right.  
 7 Q. Any other animals owned by either company?  
 8 A. No.  
 9 Q. Any jewelry or furs owned by either company?  
 10 A. No.  
 11 Q. Any art worth over \$500 owned by either  
 12 company?  
 13 A. No.  
 14 Q. You said earlier, other than the possible  
 15 debt owed by Erica Cardas or her company, you don't  
 16 know of any debts owed to you or Mr. Dean, correct?  
 17 A. Just whatever we have with Canyon Pines. I  
 18 mean, we help -- we developed it, and there's money of  
 19 ours into the place that at some point comes back.  
 20 Q. And how much total is into Canyon Pines  
 21 that's you or Mr. Dean's money?  
 22 A. I think we put in over \$500,000, but I can't  
 23 give you an exact amount.  
 24 Q. Over \$500,000 of yours is into Canyon Pines?  
 25 A. Of Spectrum.

1 A. David and Erin have their own vehicles, but  
 2 I think that they're theirs personally, not Canyon  
 3 Pines.  
 4 Q. So, as far as you know, is the Dodge Ram the  
 5 only vehicle that Canyon Pines or Spectrum Northwest  
 6 own?  
 7 A. Right.  
 8 Q. Does either company own any boats?  
 9 A. No.  
 10 Q. Any planes?  
 11 A. No.  
 12 Q. Any trailers or equipment?  
 13 A. There's equipment, there's four-wheelers  
 14 with attachments.  
 15 Q. Owned by who?  
 16 A. I'm sorry?  
 17 Q. Owned by which company?  
 18 A. Spectrum.  
 19 Q. How many four-wheelers?  
 20 A. Two.  
 21 Q. Are those on the ranch?  
 22 A. Yes.  
 23 Q. Any other vehicles or vessels owned by  
 24 Spectrum Northwest or Canyon Pines?  
 25 A. The attachments for the four-wheelers,

1 Q. Okay. Well, let me parse that out a little  
 2 more carefully then.  
 3 In regard to money of yours or Mr. Dean's,  
 4 how much money do you have into Canyon Pines?  
 5 A. You know, I'd have to look it up, because I  
 6 believe that there was money of mine that went in  
 7 there, and that takes me back to that -- oh, man.  
 8 Spectrum put in money, I put in money, I'd have to  
 9 look it up to see what's -- when --  
 10 Q. Does Spectrum own shares in Canyon Pines?  
 11 A. No, I own shares.  
 12 Q. And you own only 3,000 shares?  
 13 A. I believe so, yes.  
 14 Q. And you personally paid \$3,000 for those?  
 15 A. Yes.  
 16 Q. What was the 500,000, approximately \$500,000  
 17 that Spectrum put into Canyon Pines?  
 18 A. That was the development of it.  
 19 Q. But as far as you know, Spectrum didn't  
 20 receive any stock or shares in return for that?  
 21 A. I don't think so.  
 22 Q. Is that a \$500,000 loan that's owed back to  
 23 Spectrum?  
 24 A. I don't know if it's -- it's a loan in some  
 25 way, of course, but when they're up and running and

1 they're making money, then we were supposed to get a  
 2 certain percentage of return on investment.  
 3 Q. What was that percentage of return?  
 4 A. Probably I think it's 40 percent.  
 5 Q. And how was that to be paid back?  
 6 A. Well, I'm not sure what you mean. Are you  
 7 talking about monthly or quarterly or --  
 8 Q. Well, yeah, was there supposed to be a lump  
 9 sum payment at the end of a certain year, or were  
 10 there going to be monthly payments beginning sometime?  
 11 A. It had to be either monthly or quarterly is  
 12 what I'm thinking.  
 13 Q. And when are those supposed to begin?  
 14 A. When they make a profit.  
 15 Q. Do you have a current projection of when  
 16 that might be?  
 17 A. I think that they were looking at the third  
 18 year, so it would be two years from now. We hope it  
 19 to be sooner.  
 20 Q. Yeah.  
 21 Any other debts owed to Spectrum or Canyon  
 22 Pines that you know of?  
 23 A. Not that come to mind.  
 24 Q. Do you or Mr. Dean have any contracts with  
 25 anybody?

1 A. No.  
 2 Q. You're not in the midst of any contract with  
 3 anyone that you know of?  
 4 A. No.  
 5 Q. Do you know of any contracts that Spectrum  
 6 Northwest or Canyon Pines has with anyone?  
 7 A. No.  
 8 Q. Other than the mortgages that we've already  
 9 discussed earlier today and the credit card debt, do  
 10 you or Mr. Dean owe any debts to anyone else?  
 11 A. I don't think so. I mean, I have my regular  
 12 creditors.  
 13 Q. What do you mean by regular creditors? You  
 14 mean utility bills and so forth?  
 15 A. Right, phone bill, cell phone.  
 16 Q. But other than services that are being  
 17 provided to you on a regular basis that you have to  
 18 pay for, do you or Mr. Dean owe any other debts, other  
 19 than those that we've discussed?  
 20 A. No.  
 21 Q. Does Spectrum owe any debts, that being  
 22 Spectrum Northwest?  
 23 A. I don't know what's sitting out there.  
 24 There's a couple of invoices. I don't know what they  
 25 are or how much they are.

1 Q. Invoices for what?  
 2 A. I'm not real sure. The last one that came  
 3 in the mail last week was for some computer help.  
 4 Q. What's the approximate amount of that  
 5 invoice?  
 6 A. I think it was \$150.  
 7 Q. What was the other invoice or invoices?  
 8 A. I'm trying to recall.  
 9 Q. Well, let me ask, does Spectrum owe any  
 10 debts of over a thousand dollars that you know of?  
 11 A. I don't know at this point.  
 12 Q. Well, let me put it this way: Do you know  
 13 of any debt of over a thousand dollars that Spectrum  
 14 Northwest owes?  
 15 A. Not at this time I don't.  
 16 Q. Other than money that Canyon Pines owes to  
 17 Spectrum, do you know of any debt of over a thousand  
 18 dollars that Canyon Pines owes?  
 19 A. I don't know about that, no. As I said, I'm  
 20 a signatory on the account, but I don't take care of  
 21 the books. This is David and Erin's business.  
 22 Q. When you sold Spectrum Print & Mail, you  
 23 eventually received approximately, according to you  
 24 and Mr. Dean, \$3.4 million --  
 25 A. Yes.

1 Q. -- in cash eventually?  
 2 A. It was cash and stocks.  
 3 Q. Well, you can correct me, but my  
 4 understanding was once you cashed out the stock, total  
 5 amount was about \$3.4 million?  
 6 A. Yes.  
 7 Q. Where has that -- where did you deposit that  
 8 \$3.4 million? Well, let me first say, you finally  
 9 received the last amount in February of 2002?  
 10 A. Yes.  
 11 Q. Okay. And where have you disbursed that to?  
 12 A. Well, at the very beginning, at the close of  
 13 the sale, I received 600,000 cash.  
 14 Q. Okay.  
 15 A. That got spent. It was a debt that Global  
 16 didn't assume, lines of credits, paying myself back  
 17 for monies that I put into the business.  
 18 Q. How much did you pay back to yourself?  
 19 A. I was -- actually, I didn't pay it to  
 20 myself, I paid it back to the home equity.  
 21 Q. Okay. So, that original 600,000, all  
 22 600,000 went to paying off debts that existed at that  
 23 time?  
 24 A. And a pretty extravagant Christmas party  
 25 that we put on for the employees that year.

1 Q. And about how much did that cost?  
 2 A. It was over \$20,000.  
 3 Q. Okay. So, that's 600,000 of the 3.4  
 4 million; what about the remaining 2.8 million?  
 5 A. Well, there was a million dollars for  
 6 capital that transferred from -- well, that was put  
 7 into Spectrum Northwest.  
 8 Q. And when was that?  
 9 A. That would have been February 2002.  
 10 There were capital gains taxes that had to  
 11 be paid.  
 12 Q. What was the approximate amount of that?  
 13 A. I think Jeff said it was \$580,000.  
 14 As you know, there was \$250,000 that went to  
 15 the employees. And again, since June, about \$750,000  
 16 has gone to satisfy his restitution and to attorney's  
 17 fees.  
 18 Q. Of that \$750,000 figure, so that's about 612  
 19 to McNaul Ebel, and another 140,000 or so to  
 20 attorney's fees?  
 21 A. Approximately.  
 22 Q. So, that's about, roughly, by my  
 23 calculation, accounts for about -- leaves about  
 24 200,000 left from that original 3.4 million; do you  
 25 know where that other approximately 200,000 went?

1 A. Some of it's been spent, obviously. Jeff  
 2 and I like to travel. I guess you might say we've  
 3 lived a little high on the hog.  
 4 Q. At this point, out of that 3.4 million,  
 5 other than the assets we've discussed and the \$800  
 6 that you have in your checking accounts and wallets,  
 7 the only remaining money is in the Spectrum Northwest  
 8 accounts?  
 9 A. Right.  
 10 Q. And you don't know what that balance is?  
 11 A. I don't know. Are you going to depose Jeff?  
 12 So, I mean, he can --  
 13 Q. Well, I mean --  
 14 A. I --  
 15 Q. Other than what we've discussed today, is  
 16 there anyone else, any other person or entity, holding  
 17 any money or property for you or Mr. Dean whatsoever?  
 18 A. No.  
 19 Q. Or holding any money or property for you or  
 20 Mr. Dean to use or benefit from?  
 21 A. No.  
 22 Q. Other than the money that you paid in to  
 23 McNaul Ebel and in attorney's fees, during 2004, have  
 24 you or Mr. Dean made any other transfers of over  
 25 \$5,000?

1 A. I don't think so.  
 2 Q. Have you made any transfers of over \$2,000  
 3 since the judgment was entered in this case?  
 4 A. I made the \$1,500 into my checking account.  
 5 Q. From the Spectrum Northwest account?  
 6 A. Right.  
 7 Q. When you did that, did you get a current  
 8 balance on the Spectrum Northwest account?  
 9 A. I just wrote the check and deposited it into  
 10 my account. I didn't update any books.  
 11 Q. Okay. Have you, other than Spectrum  
 12 Northwest -- let me go back for a minute.  
 13 Spectrum Print & Mail no longer exists, is  
 14 that correct?  
 15 A. It doesn't for us or for me.  
 16 Q. Okay.  
 17 A. The only reason I say that is because  
 18 somewhere in the trial I thought it was said that it  
 19 stands alone within Global and Diebold has its own  
 20 entity; I don't want to be --  
 21 Q. Okay. Well, with that exception, do you or  
 22 Mr. Dean have any connection whatsoever with Spectrum  
 23 Print & Mail any longer?  
 24 A. Oh, no.  
 25 Q. Other than the name of Spectrum Print & Mail

1 or Spectrum Northwest or Jeff or Deborah Dean, have  
 2 you or Mr. Dean ever held any money or asset in --  
 3 under -- held any other asset under any other name?  
 4 A. No. There's Jeff, there's myself, there's  
 5 Spectrum Northwest, and there's Canyon Pines.  
 6 Q. Have you or Jeff ever held any bank accounts  
 7 under any alias name? Ever used a different name to  
 8 hold or open --  
 9 A. You mean other than our own names?  
 10 Q. Yes.  
 11 A. No.  
 12 Q. Do you know of any additional planned  
 13 investments in Canyon Pines or Spectrum Northwest?  
 14 A. Additional planned, is that what you said?  
 15 Q. Investments, yeah, is there anyone else that  
 16 you know of that's planning to invest in those  
 17 companies?  
 18 A. Oh, no.  
 19 Q. Do you or Mr. Dean have any plans to gain  
 20 employment in the near future?  
 21 A. Unfortunately, it looks like we might have  
 22 to if things don't go well.  
 23 Q. Have you applied for any jobs?  
 24 A. No.  
 25 Q. Do you have any travel planned in the coming



1 A. 1969.  
 2 Q. Okay.  
 3 A. I'm sorry, 1970.  
 4 Q. Any other formal education besides that?  
 5 A. No.  
 6 Q. Any certifications or accreditations of any  
 7 kind besides that?  
 8 A. No.  
 9 Q. Where were you first employed after  
 10 graduating from high school?  
 11 A. Not relevant.  
 12 Q. Well, I'm entitled to ask this information.  
 13 MR. MASON: He can get into that, and it's  
 14 no big deal either way.  
 15 THE WITNESS: Actually, it isn't.  
 16 A. I was employed by The Boeing Company.  
 17 Q. Beginning in what year?  
 18 A. 1967.  
 19 Q. And how long were you employed there?  
 20 A. Until 1975, so that's eight years.  
 21 Q. Did you work full time during that period?  
 22 A. Only for the first five years.  
 23 Q. What happened after those five years?  
 24 A. I started my own business and took a leave of  
 25 absence.

1 Q. And what business was that, that you started?  
 2 A. It was a design and manufacturing company for  
 3 general aviation.  
 4 Q. What was the name of that?  
 5 A. Astec, A-s-t-e-c.  
 6 Q. You started that in '71?  
 7 A. Correct.  
 8 Q. And how long did you own Astec?  
 9 A. Nine years.  
 10 Q. So from '75 through '80 you did --  
 11 A. '71 through '80.  
 12 Q. And from '75 forward you did that full time?  
 13 A. Correct.  
 14 Q. What happened to Astec?  
 15 A. I sold it.  
 16 Q. In '80?  
 17 A. Yes.  
 18 Q. Who did you sell it to?  
 19 A. Not relevant.  
 20 Q. You still need to answer the question.  
 21 A. Not relevant.  
 22 MR. MASON: Here's why he can convince a  
 23 judge it's potentially relevant. If he thinks that  
 24 somehow you were unfair to someone else when you sold  
 25 the company, he can go digging for that.

1 Since you weren't, who cares? So we  
 2 should tell him who you sold it to, because he can  
 3 convince a judge that it's potentially relevant.  
 4 THE WITNESS: This is quite a fishing  
 5 expedition.  
 6 A. Raleigh-Durham Aviation.  
 7 Q. That was in '80?  
 8 A. Uh-huh.  
 9 Q. And where did you work next after Astec?  
 10 A. I worked in a consulting business.  
 11 Q. What was the name of that?  
 12 A. Dean, Redmond & Associates.  
 13 Q. And that was beginning in '80?  
 14 A. Uh-huh.  
 15 Q. Where was that located?  
 16 A. In Redmond.  
 17 Q. What kind of consulting did that business do?  
 18 A. I designed and installed  
 19 management-information systems.  
 20 Q. Were you an owner of that business?  
 21 A. Yes.  
 22 Q. Were there any other owners?  
 23 A. Yes.  
 24 Q. And who were those?  
 25 A. Mike Redmond.

1 Q. How much of the company did you own?  
 2 A. Fifty-one percent.  
 3 Q. How long did you work at Dean, Redmond &  
 4 Associates?  
 5 A. Eight years.  
 6 Q. What happened to the business at the end of  
 7 those eight years?  
 8 A. We parted company. The business terminated.  
 9 Q. Where did you work next after Dean, Redmond?  
 10 A. Spectrum.  
 11 Q. When was that?  
 12 A. 1995.  
 13 Q. No employment between '88 and '95?  
 14 A. No.  
 15 Q. Did you own Spectrum?  
 16 A. No.  
 17 Q. Who owned it?  
 18 A. Deborah Dean.  
 19 Q. You began there in '95 and worked there until  
 20 when?  
 21 A. December 31, 2000.  
 22 Q. What did you do between Dean, Redmond and  
 23 Spectrum?  
 24 A. You already know, and we're not going to get  
 25 into that, and we will walk out of here if we don't